

Exhibit 1

Rowe v. Google LLC
Case No. 19-cv-08655 (JHR)
Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
08/22/2018	Cara E. Greene	CEG	1.5	\$950.00	\$1,425.00	Initial consultation.
08/28/2018	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence with client.
09/19/2018	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Telephone call with client.
09/27/2018	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Telephone call with client.
11/05/2018	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Telephone call with client re status.
11/06/2018	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Review and edit client email letter.
11/20/2018	Cara E. Greene	CEG	0.9	\$950.00	\$855.00	Telephone call with client.
11/21/2018	Lauren B. McGlothlin	LBM	0.1	\$450.00	\$45.00	Correspond with CEG re demand letter.
11/27/2018	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence with client.
11/30/2018	Lauren B. McGlothlin	LBM	0.3	\$450.00	\$135.00	Conference with CEG re demand letter and facts of case.
12/06/2018	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Conference with LBM re demand letter.
12/09/2018	Lauren B. McGlothlin	LBM	4.2	\$450.00	\$1,890.00	Draft demand letter.
12/10/2018	Lauren B. McGlothlin	LBM	4.7	\$450.00	\$2,115.00	Draft demand letter (4.2); research failure to promote case law re same (.5).
12/11/2018	Lauren B. McGlothlin	LBM	2.1	\$450.00	\$945.00	Edit demand letter (1.9); conference with CEG re same (.1); correspond with client re same (.1)
12/14/2018	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Conference with LBM re demand letter.
12/14/2018	Lauren B. McGlothlin	LBM	3.8	\$450.00	\$1,710.00	Edit demand letter and send to CEG for review.
12/17/2018	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence with ATK re class action angle.
12/18/2018	Lauren B. McGlothlin	LBM	1.7	\$450.00	\$765.00	Review CEG's edits to demand letter and revise same.
12/20/2018	Lauren B. McGlothlin	LBM	0.1	\$450.00	\$45.00	Correspond with client re demand letter.
12/21/2018	Lauren B. McGlothlin	LBM	1.3	\$450.00	\$585.00	Edit demand letter with client's edits (1.1); correspond with CEG and AAB re same (.2)
01/03/2019	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Conference with AAB re negotiation status.
01/10/2019	Cara E. Greene	CEG	0.9	\$950.00	\$855.00	Edit demand letter.
01/25/2019	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence with P. Cooper.
01/25/2019	Lauren B. McGlothlin	LBM	0.2	\$450.00	\$90.00	Correspond with client re correspondence with opposing counsel re demand letter (.1); conference with CEG re same (.1)
01/30/2019	Lauren B. McGlothlin	LBM	0.1	\$450.00	\$45.00	Correspond with client re contacting opposing counsel.
02/01/2019	Lauren B. McGlothlin	LBM	0.1	\$450.00	\$45.00	Correspond with counsel re demand letter and setting up telephone call.
02/13/2019	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Status call with client.
02/13/2019	Lauren B. McGlothlin	LBM	0.5	\$450.00	\$225.00	Telephone call with client re status of matter and strategy.
02/14/2019	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence with K. Gage.
02/22/2019	Lauren B. McGlothlin	LBM	0.3	\$450.00	\$135.00	Review client correspondence re elimination of arbitration agreements at Company (.1); correspond with client re same (.1); correspond with CEG re same (.1).
02/24/2019	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence with client.
02/25/2019	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Telephone call with client.
02/25/2019	Lauren B. McGlothlin	LBM	0.3	\$450.00	\$135.00	Telephone call with client and CEG re meeting re department reorganization
02/26/2019	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence with K. Gage.
02/26/2019	Lauren B. McGlothlin	LBM	0.2	\$450.00	\$90.00	Correspond with CEG re status of matter (.1); correspond with client re cancelled meeting re Company restructuring (.1).
02/28/2019	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence with opposing counsel.
02/28/2019	Lauren B. McGlothlin	LBM	0.2	\$450.00	\$90.00	Correspond with CEG re telephone call with counsel and client's cancelled reorganization meeting (.1); correspond with client re same (.1).
03/04/2019	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Telephone call with K. Gage; correspondence with client re same.
03/04/2019	Lauren B. McGlothlin	LBM	0.4	\$450.00	\$180.00	Telephone call with counsel re facts of matter and potential negotiated resolution
03/05/2019	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Conference with LBM re SOL calculation.
03/05/2019	Lauren B. McGlothlin	LBM	0.2	\$450.00	\$90.00	Correspond with counsel re tolling agreement.
03/11/2019	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Edit email to K. Gage re tolling agreement.
03/11/2019	Lauren B. McGlothlin	LBM	0.5	\$450.00	\$225.00	Conferences with CEG re filing deadlines and executing tolling agreement (.3); correspond with counsel re same (.2)
03/12/2019	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence with client re status.
03/13/2019	Cara E. Greene	CEG	0.6	\$950.00	\$570.00	Conference with LBM re filing deadline; edit tolling agreement and correspondence with K. Gage re same; telephone call with client; correspondence with K. Gage.
03/13/2019	Lauren B. McGlothlin	LBM	1.4	\$450.00	\$630.00	Correspond with client re work meeting and statute of limitations (.2); draft rolling agreement for CEG's review (.6); conferences with CEG re same (.3); edit draft and send same to counsel (.3).
03/14/2019	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence with client re status, tolling agreement.
03/14/2019	Lauren B. McGlothlin	LBM	0.1	\$450.00	\$45.00	Conference with CEG re tolling agreement.
03/15/2019	Cara E. Greene	CEG	1.0	\$950.00	\$950.00	Telephone call with client; message to K. Gage; organize notes for call with K. Gage; telephone call with K. Gage; telephone call with K. Gage.
03/15/2019	Lauren B. McGlothlin	LBM	0.1	\$450.00	\$45.00	Conference with CEG re tolling agreement.
03/20/2019	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Telephone call with client re status.
03/22/2019	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence with client re positions.
03/27/2019	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Telephone call with K. Gage.
03/27/2019	Lauren B. McGlothlin	LBM	0.5	\$450.00	\$225.00	Telephone call with counsel re settlement negotiations and mediation options (.4); correspond with client re same (.1).
03/28/2019	Lauren B. McGlothlin	LBM	0.5	\$450.00	\$225.00	Review tolling agreement (.3); conference with CEG re same (.2):.
04/01/2019	Lauren B. McGlothlin	LBM	0.4	\$450.00	\$180.00	Edit tolling agreement and accept edits from counsel (.2); correspond with CEG re same (.2)
04/02/2019	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Telephone call with K. Gage re negotiations; conference with LBM re same.
04/02/2019	Lauren B. McGlothlin	LBM	0.9	\$450.00	\$405.00	Edit and finalize tolling agreement (.2); correspond with counsel re same and negotiations (.2); correspond with client re update re same (.1); telephone call with counsel re negotiation discussion (.4).
04/05/2019	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Edit letter to client.
04/05/2019	Lauren B. McGlothlin	LBM	0.3	\$450.00	\$135.00	Draft correspondence to client re damages and settlement discussions with counsel.
04/09/2019	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Telephone call with K. Gage re exchanging information.
04/09/2019	Lauren B. McGlothlin	LBM	0.9	\$450.00	\$405.00	Correspond with CEG re drafting litigation committee memo (.2); draft memo re same (.5); telephone call with counsel re exchanging information (.2).
04/15/2019	Cara E. Greene	CEG	0.9	\$950.00	\$855.00	Review and edit litigation memo.
04/15/2019	Lauren B. McGlothlin	LBM	4.5	\$450.00	\$2,025.00	Draft Lit Comm memo re litigation in matter (3.7); conferences with CEG re same (.2); edit same and circulate to Lit Comm (.6).
04/16/2019	Cara E. Greene	CEG	0.9	\$950.00	\$855.00	Litigation committee meeting (.7); Conference with LBM re same (.2).
04/16/2019	Lauren B. McGlothlin	LBM	1.7	\$450.00	\$765.00	Prepare for Lit Comm presentation on client's matter and organize compensation materials (.7); conferences with CEG re same (.2); present at Lit Comm re same (.8).
04/18/2019	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Telephone call with client.
04/23/2019	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence with client, K. Gage.
04/24/2019	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Telephone call with K. Gage re negotiations.
04/24/2019	Lauren B. McGlothlin	LBM	0.5	\$450.00	\$225.00	Telephone call with CEG and counsel re exchanging information related to claims
05/03/2019	Lauren B. McGlothlin	LBM	0.2	\$450.00	\$90.00	Correspond with client re information from counsel
05/04/2019	Lauren B. McGlothlin	LBM	0.2	\$450.00	\$90.00	Organize and edit notes from call with counsel to prepare for call with client
05/06/2019	Cara E. Greene	CEG	0.6	\$950.00	\$570.00	Telephone call with client; correspondence with LBM re email to K. Rowe

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05/06/2019	Lauren B. McGlothlin	LBM	1.8	\$450.00	\$810.00	Telephone call with client re information from counsel (.5); draft correspondence to counsel re remaining questions and provide additional information (1.3).
05/07/2019	Lauren B. McGlothlin	LBM	0.2	\$450.00	\$90.00	Review client correspondence re additional information for counsel and correspond with client re same
05/09/2019	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Review and edit settlement correspondence to K. Gage.
05/09/2019	Lauren B. McGlothlin	LBM	0.5	\$450.00	\$225.00	Edit draft correspondence to counsel (.3); conference with CEG re same (.1); send same to client for review (.1)
05/10/2019	Cara E. Greene	CEG	1.1	\$950.00	\$1,045.00	Edit email to K. Gage and correspondence with client re same.
05/10/2019	Lauren B. McGlothlin	LBM	1.3	\$450.00	\$585.00	Correspond multiple times with client and CEG re editing correspondence to counsel (.8); edit same (.5)
05/13/2019	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Conference with LBM re tolling agreement.
05/13/2019	Lauren B. McGlothlin	LBM	1.1	\$450.00	\$495.00	Telephone call with counsel re executing amended tolling agreement (.2); conferences with CEG re same (.4); draft amended agreement (.5).
05/14/2019	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Edit tolling agreement.
05/14/2019	Lauren B. McGlothlin	LBM	0.2	\$450.00	\$90.00	Edit tolling agreement and correspond with CEG re same.
05/15/2019	Lauren B. McGlothlin	LBM	0.2	\$450.00	\$90.00	Correspond with client re case update.
05/16/2019	Lauren B. McGlothlin	LBM	0.2	\$450.00	\$90.00	Meeting with CEG re case updates and strategy.
05/23/2019	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Correspondence with client re litigation options.
05/23/2019	Lauren B. McGlothlin	LBM	0.7	\$450.00	\$315.00	Draft correspondence to client re litigation retainer arrangement (.5); edit same (.2)
05/29/2019	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Conference with LBM re drafting complaint; correspondence re same
05/29/2019	Lauren B. McGlothlin	LBM	0.7	\$450.00	\$315.00	Conference re CEG re drafting complaint and EEOC charge (.3); correspond with SF office re law clerk assisting with same (.2); correspond with law clerk re same (.2).
05/29/2019	NY Law Clerk	NYLC	2.0	\$325.00	\$650.00	[CKAUFFMAN] Review documents (1.5); prepare draft complaint (.5).
05/30/2019	Cara E. Greene	CEG	0.6	\$950.00	\$570.00	Conference to discuss complaint drafting.
05/30/2019	Lauren B. McGlothlin	LBM	1.4	\$450.00	\$630.00	Correspond with CEG re following up with counsel (.2); correspond with counsel re same (.2); correspond with client re same (.1); teleconference with CEG and law clerk re drafting complaint (.5); follow up telephone call with law clerk re same (.2); correspond with law clerk re drafting EEOC Charge (.2).
05/30/2019	NY Law Clerk	NYLC	7.7	\$325.00	\$2,502.50	[CKAUFFMAN] Phone call re complaint draft with CEB and LBM (.6); phone call with LBM re deadlines (.1); legal research (3); draft complaint (4).
05/31/2019	Lauren B. McGlothlin	LBM	0.3	\$450.00	\$135.00	Correspond with law clerk re drafting Complaint.
05/31/2019	NY Law Clerk	NYLC	7.2	\$325.00	\$2,340.00	[CKAUFFMAN] Draft questions for LMB (1.2); legal research (3.5); draft complaint (2.5)
06/03/2019	NY Law Clerk	NYLC	6.4	\$325.00	\$2,080.00	[CKAUFFMAN] Draft complaint (3.4); legal research (3).
06/04/2019	NY Law Clerk	NYLC	1.2	\$325.00	\$390.00	[CKAUFFMAN] Draft EEOC charge (.8); legal research (.4).
06/10/2019	NY Law Clerk	NYLC	3.1	\$325.00	\$1,007.50	[CKAUFFMAN] Draft EEOC charge (2.5); compensation discrimination research (.6);
06/11/2019	NY Law Clerk	NYLC	1.8	\$325.00	\$585.00	[CKAUFFMAN] Hiring practice research (1.4); draft EEOC charge (.4).
06/12/2019	Lauren B. McGlothlin	LBM	1.4	\$450.00	\$630.00	Edit EEOC Charge.
06/13/2019	Lauren B. McGlothlin	LBM	2.0	\$450.00	\$900.00	Edit EEOC Charge and Complaint (1.8); correspond with counsel re telephone call (.2)
06/14/2019	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Telephone call with opposing counsel; review and edit tolling agreement
06/14/2019	Lauren B. McGlothlin	LBM	5.6	\$450.00	\$2,520.00	Edit EEOC Charge and Complaint (4.7); telephone call with counsel re additional information re comparators (.5); revise amended tolling agreement and send to counsel (.4).
06/15/2019	Lauren B. McGlothlin	LBM	0.2	\$450.00	\$90.00	Correspond with client re telephone call with counsel
06/17/2019	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Conference with LBM re tolling agreement, settlement.
06/17/2019	Lauren B. McGlothlin	LBM	2.6	\$450.00	\$1,170.00	Revise tolling agreement (.3); correspond with counsel and CEG re exchanging comparator information (.3); review same (.2); review and edit EEOC Charge and Complaint (1.2); telephone call with law clerk re edits re same (.6).
06/17/2019	NY Law Clerk	NYLC	0.5	\$325.00	\$162.50	[CKAUFFMAN] Call with LBM re complaint and EEOC charge (.4); draft EEOC charge cover letter and notice of appearance (.1);.
06/24/2019	Cara E. Greene	CEG	0.7	\$950.00	\$665.00	Telephone call with K. Gage, LBM re case facts.
06/24/2019	Lauren B. McGlothlin	LBM	1.6	\$450.00	\$720.00	Telephone call with counsel regarding exchanging comparator information (.9); review comparators' resumes (.7)
06/26/2019	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence re tolling agreements.
06/26/2019	Lauren B. McGlothlin	LBM	0.3	\$450.00	\$135.00	Draft revised tolling agreement.
06/26/2019	Lauren B. McGlothlin	LBM	0.5	\$450.00	\$225.00	Telephone call with client re status of matter and litigation.
06/27/2019	Lauren B. McGlothlin	LBM	0.2	\$450.00	\$90.00	Revise and finalize amended tolling agreement.
07/18/2019	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Telephone call with K. Gage.
07/18/2019	Lauren B. McGlothlin	LBM	0.9	\$450.00	\$405.00	Telephone call with counsel (.4); correspond with client re same (.2); amend tolling agreement (.3)
07/22/2019	Lauren B. McGlothlin	LBM	1.0	\$450.00	\$450.00	Edit Complaint and EEOC Charge.
08/01/2019	Lauren B. McGlothlin	LBM	0.2	\$450.00	\$90.00	Update CEG on matter before departure.
08/02/2019	Shira Gelfand	SZG	3.4	\$425.00	\$1,445.00	Review complete file, including draft filings and all correspondence to date
08/05/2019	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Telephone call with K. Gage and correspondence with client re same.
08/05/2019	Shira Gelfand	SZG	0.3	\$425.00	\$127.50	Review correspondence with client and determine next steps.
08/05/2019	Shira Gelfand	SZG	2.3	\$425.00	\$977.50	Conduct research re: New York Equal Pay Law and relevant legal standards.
08/06/2019	Shira Gelfand	SZG	0.3	\$425.00	\$127.50	Review correspondence from client re: next steps in matter and question re: employee leaving company
08/06/2019	Shira Gelfand	SZG	0.7	\$425.00	\$297.50	Review current tolling agreement and amend to include proposed edits.
08/07/2019	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Update tolling agreement and correspondence re same.
08/21/2019	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Telephone call with opposing counsel and follow up notes
08/21/2019	Shira Gelfand	SZG	0.3	\$425.00	\$127.50	Conference call with opposing counsel.
08/22/2019	Cara E. Greene	CEG	0.8	\$950.00	\$760.00	Telephone call with client re filing complaint.
08/22/2019	Cara E. Greene	CEG	0.0	\$0.00	\$0.00	Research client and press contacts in advance of filing and correspondence/ telephone calls re same (1.5) (no charge).
08/22/2019	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Arrange next steps for filing complaint, including drafting summons and civil cover sheet
08/22/2019	Shira Gelfand	SZG	0.8	\$425.00	\$340.00	Conference call with CEG and client.
08/23/2019	Cara E. Greene	CEG	2.6	\$950.00	\$2,470.00	Edit EEOC charge and complaint.
08/26/2019	Cara E. Greene	CEG	6.1	\$950.00	\$5,795.00	Conference with client and SZG re filing complaint (2.5); edit same and EEOC charge (3.6)
08/26/2019	Shira Gelfand	SZG	2.0	\$425.00	\$850.00	Meeting with Ulku Rowe re: complaint.
08/27/2019	Shira Gelfand	SZG	0.4	\$425.00	\$170.00	Review client edits to complaint and correspondence re: fees.
08/28/2019	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Finalize complaint and send to K. Gage.
08/28/2019	Shira Gelfand	SZG	0.0	\$0.00	\$0.00	Review correspondence from UR re: press (.1)(no charge).
08/28/2019	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Review finalized complaint and correspondence with opposing counsel
08/29/2019	Cara E. Greene	CEG	1.0	\$950.00	\$950.00	Telephone call with client re filing, correspondence re same
08/29/2019	Shira Gelfand	SZG	0.0	\$0.00	\$0.00	Correspondence with client and CEG re: scheduling time to discuss press issue (.2), Call with client re: demand and press issues (.8) (no charge).
08/29/2019	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with opposing counsel re Complaint.
08/30/2019	Cara E. Greene	CEG	0.7	\$950.00	\$665.00	Correspondence with client, opposing counsel.
08/30/2019	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Correspondence with client re: settlement demand and tax implications.
09/03/2019	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Review correspondence with counsel re: settlement negotiations.
09/04/2019	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Review client correspondence.
09/09/2019	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Review correspondence with client re: settlement negotiation.
09/10/2019	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Telephone call and correspondence with client, conference with SZG re same
09/10/2019	Shira Gelfand	SZG	0.4	\$425.00	\$170.00	Correspondence with client re: discussion today (.2); Correspondence with paralegal re: preparation for filing (.2)
09/11/2019	Cara E. Greene	CEG	0.0	\$0.00	\$0.00	Draft press release, FAQs, correspondence to client (.8)(no charge).

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
09/11/2019	Shira Gelfand	SZG	0.0	\$0.00	\$0.00	Attention to correspondence re: press release (.4)(no charge).
09/11/2019	Shira Gelfand	SZG	0.4	\$425.00	\$170.00	Edit draft Complaint to include correct Google entity (.1); Meeting re: filing and legal claims (.3)
09/12/2019	Shira Gelfand	SZG	0.0	\$0.00	\$0.00	Review correspondence re: filing and press release (.3)(no charge).
09/16/2019	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence with client re filing.
09/17/2019	Cara E. Greene	CEG	1.8	\$950.00	\$1,710.00	Prepare and file complaint.
09/17/2019	Shira Gelfand	SZG	5.6	\$425.00	\$2,380.00	Correspondence with client re: EEOC charge (.3); Review and edit complaint and EEOC Charge, Draft cover letter, charge form, notice of appearance, prepare all documents for filing (5.3).
09/18/2019	Shira Gelfand	SZG	0.0	\$0.00	\$0.00	Correspondence re: press inquiries (.2)(no charge).
09/18/2019	Shira Gelfand	SZG	0.7	\$425.00	\$297.50	Attention to letter to corporate counsel, supplement letter for mailing (.3); Correspondence with opposing counsel re: service of process (.2).
09/19/2019	Shira Gelfand	SZG	0.4	\$425.00	\$170.00	Review correspondence re: filing (.2); review correspondence and discuss waiver of service of process (.2)
09/23/2019	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Review client correspondence.
09/24/2019	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Review FRCP 4 communications.
09/24/2019	Shira Gelfand	SZG	0.9	\$425.00	\$382.50	Team meeting to review outgoing items (.1); Discussion with paralegal to prepare for waiver of service, review packet (.7); Client correspondence re: scheduling meeting (.1).
09/25/2019	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Telephone call with client re strategy and options.
09/25/2019	Shira Gelfand	SZG	0.7	\$425.00	\$297.50	Client call (.5); Attention to correspondence re: service of process waiver (.2);
09/30/2019	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Correspondence with client and conference with TTM re ER meeting
10/01/2019	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence with client re meeting with ER.
10/02/2019	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence with client.
10/02/2019	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Review client communications.
10/04/2019	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Submit Waiver of the Service of Summons to the Court.
10/07/2019	Cara E. Greene	CEG	0.8	\$950.00	\$760.00	Prep client for ER interview.
10/07/2019	Shira Gelfand	SZG	0.7	\$425.00	\$297.50	Attention to filing waiver of service of process (.4); Review correspondence from SDNY re: upcoming initial conference and evaluate next steps (.3);.
10/08/2019	Shira Gelfand	SZG	0.4	\$425.00	\$170.00	Review docket entry re: preliminary conference, review deadline to file Answer and SDNY employment protocols, determine next steps (.4).
10/16/2019	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Correspondence re ER e-mail and draft same.
10/16/2019	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with opposing counsel.
10/28/2019	Shira Gelfand	SZG	0.5	\$425.00	\$212.50	Review correspondence and attached EEOC notice of right to sue (.4); Correspondence re: scheduled meetings (.1)
10/30/2019	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Telephone call with client.
10/31/2019	Shira Gelfand	SZG	0.5	\$425.00	\$212.50	Case management meeting (.2); Correspondence with JS re: Google questions (.3).
11/01/2019	Brian D. Kouassi	BDK	0.8	\$325.00	\$260.00	Review case docket and pull documents into internal document system.
11/01/2019	Brian D. Kouassi	BDK	0.6	\$325.00	\$195.00	Obtain and review details of case.
11/11/2019	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence with client.
11/11/2019	Shira Gelfand	SZG	0.4	\$425.00	\$170.00	Correspondence with opposing counsel (.3); Client correspondence (.1)
11/12/2019	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Telephone call with opposing counsel.
11/12/2019	Shira Gelfand	SZG	1.3	\$425.00	\$552.50	Attention to client correspondence re: filing implications (.2); Correspondence with opposing counsel re: SDNY mandatory mediation, review protocols (.4); Preparation for, and call with opposing counsel (.3); Case management meeting with CEG (.2); Correspondence with law clerks re: amending complaint (.2).
11/13/2019	Shira Gelfand	SZG	0.4	\$425.00	\$170.00	Correspondence with opposing counsel re: stipulation (.2); Correspondence with law clerk re: amending complaint (.2);.
11/14/2019	NY Law Clerk	NYLC	1.5	\$325.00	\$487.50	Edit Complaint [SWX].
11/14/2019	Shira Gelfand	SZG	1.5	\$425.00	\$637.50	Draft proposed stipulation for court schedule (.9); Review amended complaint, make edits, send to CEG (.6)
11/15/2019	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Conference with CEG re joint letter and proposed Case Management Plan and Scheduling Order
11/15/2019	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Review of case docket re Court orders and update new case deadline.
11/15/2019	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Correspondence with team re new deadlines re Court Order and Joint Letter.
11/15/2019	Brian D. Kouassi	BDK	0.7	\$325.00	\$227.50	Draft and send Letter to adjourn to CEG for her review.
11/15/2019	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with CEG re various pertaining to upcoming filing
11/15/2019	Brian D. Kouassi	BDK	1.6	\$325.00	\$520.00	File Letter Motion re Joint Request for Adjournment and Proposed Schedule in SDNY
11/15/2019	Cara E. Greene	CEG	1.2	\$950.00	\$1,140.00	Prepare filing and review judge's individual practices.
11/18/2019	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Pull newly filed documents from SDNY ECF and save in iManage.
11/18/2019	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Plan for case overview conference with CEG and SXG.
11/19/2019	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Pull Judge Schofield's Order on Motion to Adjourn Conference to the Mediation Clerk for case proceedings
11/19/2019	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Update case online Ordered by the Judge Schofield.
11/19/2019	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Research work product privilege; correspondence with E. Powers.
11/20/2019	Cara E. Greene	CEG	0.0	\$0.00	\$0.00	Correspondence with client, E. Powers press strategy for litigation (.1)(no charge).
11/20/2019	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Correspondence with C. Brown re court order.
11/21/2019	Cara E. Greene	CEG	1.0	\$950.00	\$950.00	Telephone call with client and E. Powers re press and litigation strategy (.8); conference with SZG re amended complaint filing (.2).
11/21/2019	Shira Gelfand	SZG	3.4	\$425.00	\$1,445.00	Call with press person, CEG, & UR re: op ed (.8); Call with UR and CEG (.3); Case management meeting with CEG (.4); Review correspondence from client and draft op ed (.6); Review correspondence with opposing counsel (.4); Review order from judge (.6); Correspondence with paralegal (.3).
11/22/2019	Cara E. Greene	CEG	0.9	\$950.00	\$855.00	Finalize and file amended complaint.
11/22/2019	Shira Gelfand	SZG	6.3	\$425.00	\$2,677.50	Prepare for case management meeting with CEG (.2); correspondence with paralegals re: filing amended complaint (.3); edit and supplement amended complaint (1.3); correspondence with CEG re: amended complaint (.3); conduct research re: service of process for amended complaints (.6); review of judge rules and correspondence, begin drafting joint letter and case management plan (3.6).
11/24/2019	Shira Gelfand	SZG	1.7	\$425.00	\$722.50	Continue drafting initial joint letter, send to CEG (1.7).
11/25/2019	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Review and edit joint letter to court, review Judge's individual practices
11/25/2019	Shira Gelfand	SZG	1.7	\$425.00	\$722.50	Continue drafting joint letter to court (1.3); case management meeting (.2); correspondence with paralegals re: request for adjournment (.2).
11/26/2019	Brian D. Kouassi	BDK	0.8	\$325.00	\$260.00	File Letter Motion for Request an Adjournment of the Preliminary Conference scheduled for December 5, 2019 to SDNY.
11/26/2019	Cara E. Greene	CEG	1.6	\$950.00	\$1,520.00	Request adjournment from court (.5); meet and confer with opposing counsel (.6); edit op ed (.5)
11/26/2019	Daniel Stromberg	DXS	0.6	\$875.00	\$525.00	Review defendant proposed ESI protocol, edit and advise CEG.
11/26/2019	Shira Gelfand	SZG	2.9	\$425.00	\$1,232.50	Correspondence with CEG and BK re: joint letter and request for adjournment (.3); Review opposing counsel's ESI proposals (.7); Review DXS redline to ESI proposals (.6); Call with opposing counsel and CEG (.9); Review CEG and UR correspondence re: op ed, review latest edits (.4).
11/27/2019	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	File Parties Joint Letter and Proposed Scheduling Order.
11/27/2019	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Coordinate filing of adjournment request.
11/27/2019	Shira Gelfand	SZG	1.7	\$425.00	\$722.50	Correspondence with opposing counsel (.3); review defendants edits to joint letter (.5); review case management plan (.4); review judges order re request for adjournment (.3); review correspondence with paralegal re filing (.2).
12/02/2019	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Pull and file documents recently filed in the case.
12/02/2019	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Pull Judge Schofield's decision on Plaintiff's request an adjournment of the preliminary conference
12/02/2019	Shira Gelfand	SZG	0.3	\$425.00	\$127.50	Review correspondence re: op ed (.1) internal correspondence re: initial pretrial conference (.2)

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Case No. 19-cv-08655 (JHR)
Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
12/02/2019	Shira Gelfand	SZG	5.4	\$425.00	\$2,295.00	Finalize edits to first draft of brief, cite check brief, send to CEG for review (3.3); Organization of files and documents from hearing, correspondence with HJ (2.1).
12/03/2019	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Pull documents recently filed by Judge Schofield.
12/03/2019	Shira Gelfand	SZG	0.8	\$425.00	\$340.00	Review order from court re: initial pre-hearing conference (.4); Correspondence with CEG and BK re: same (.1); Review filing from Google (.3).
12/05/2019	Shira Gelfand	SZG	0.6	\$425.00	\$255.00	Attention to case management plan and employment protocols to determine production requests and initial disclosures, review upcoming deadlines.
12/06/2019	Cara E. Greene	CEG	0.6	\$950.00	\$570.00	OpEd edits/correspondence.
12/09/2019	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Conference with CEG and SXG re upcoming deadlines and case overview.
12/09/2019	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Update case deadline pursuant to Judge Schofield's Order on Civil Case Management.
12/09/2019	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence with client.
12/09/2019	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Conference with BK re case overview.
12/09/2019	Shira Gelfand	SZG	1.0	\$425.00	\$425.00	Case management meeting with CEG and BK (.5); Correspondence with client (.3); Meeting with AXR re: initial disclosures and discovery (.2).
12/10/2019	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Update case docket folder with recently filed documents.
12/10/2019	Shira Gelfand	SZG	4.9	\$425.00	\$2,082.50	Correspondence with paralegal re: filing Answer (.3); Review SDNY rules and draft email to client re: relevant documents and ESI process (.7); Correspondence with E-Discovery counsel re: ESI meet and confer (.2); Begin drafting initial request for production of documents, review of Complaint and Answer (3.7).
12/11/2019	Brian D. Kouassi	BDK	3.3	\$325.00	\$1,072.50	Compile Litigation documents.
12/11/2019	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence re OpEd.
12/11/2019	Shira Gelfand	SZG	0.8	\$425.00	\$340.00	Client correspondence re: op-ed (.2); Review Google article on pay equity (.4); Meeting with CEG re: outstanding tasks (.2).
12/12/2019	Brian D. Kouassi	BDK	3.0	\$325.00	\$975.00	Draft the Annotated Complaint.
12/12/2019	Brian D. Kouassi	BDK	3.8	\$325.00	\$1,235.00	Compile documents for litigation profolio.
12/12/2019	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Follow-up with client re OpEd.
12/13/2019	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Telephone call with client re OpEd, status.
12/13/2019	Shira Gelfand	SZG	1.1	\$425.00	\$467.50	Call with CEG and client (.5); Case management meeting with CEG (.3); Correspondence with DS re: ESI (.1); Correspondence with client re: initial disclosures and Google's answer (.2);.
12/16/2019	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Conference with SXG re tasks before the holidays.
12/16/2019	Shira Gelfand	SZG	0.6	\$425.00	\$255.00	Review correspondence re: discovery protocols and op-ed (.4); Correspondence with paralegal re: next steps in discovery and outstanding items (.2).
12/17/2019	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Conference with CEG re case updates and new deadlines.
12/17/2019	Christopher C. Alter	CCA	0.1	\$325.00	\$32.50	Correspondence with SXG re collecting client data.
12/17/2019	Cara E. Greene	CEG	0.8	\$950.00	\$760.00	Case management meeting with SZG (.3); correspondence with E. Powers re OpEd (.2); correspondence with client re rules of civil procedure and document requests (.3).
12/17/2019	Shira Gelfand	SZG	2.4	\$425.00	\$1,020.00	Case management meeting with CEG (.4); Draft correspondence to client re: ESI (.3); Correspondence with DXS (.1); Correspondence with opposing counsel (.3) Review CEG correspondence with client (.1); Review opposing counsel's draft protective order (.6) Correspondence with ESI team re: discovery process (.2); Review of offer letter and job materials re: gag order (.7).
12/18/2019	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Clear conflicts.
12/18/2019	Shira Gelfand	SZG	1.6	\$425.00	\$680.00	Review client correspondence re: ESI, begin drafting response to questions (.3); Continue drafting first RFP (1.3)
12/19/2019	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Conference with DXS, CEG, and SXG re debrief of meeting with Opposing Counsel.
12/19/2019	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Conference with DXS, CEG, and SXG re ESI discovery and prepare for meeting with Opposing Counsel
12/19/2019	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Conference with DXS, CEG, and SXG re ESI discovery with Opposing Counsel.
12/19/2019	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Redacted documents for client's review.
12/19/2019	Cara E. Greene	CEG	2.3	\$950.00	\$2,185.00	Case management meeting with SZG (.5); prepare for meet and confer with opposing counsel (.3); meet and confer call with opposing counsel (1.0); correspondence with client re OpEd (.1); clear conflicts (.4).
12/19/2019	Daniel Stromberg	DXS	1.4	\$875.00	\$1,225.00	Review ESI protocol and proposed protective order to prepare for meet and confer (.4); pre meet and confer strategy conference with CEG (.3); meet and confer with opposing counsel re: ESI protocol (.6); post meet and confer summary call with CEG (.1).
12/19/2019	Shira Gelfand	SZG	1.9	\$425.00	\$807.50	Draft correspondence to client re: ESI (.3); Preparation for and attend case management meeting with CEG (.4); Call with opposing counsel (.5); Call with DXS, CEG, and BK (.3); Correspondence with BK re assignment, review redactions (.4).
12/20/2019	Cara E. Greene	CEG	0.9	\$950.00	\$855.00	Review and edit protective order and meet with SZG to discuss same.
12/20/2019	Daniel Stromberg	DXS	0.5	\$875.00	\$437.50	Update edits to ESI protocol (.3); draft list of ESI sources for defendant to investigate (.2)
12/20/2019	Shira Gelfand	SZG	2.3	\$425.00	\$977.50	Review DXS updated redlines to ESI protocols (.6); Review protective order, meeting with CEG re same (.6); Correspondence with opposing counsel (.3); Prepare and send updated ESI protocols to opposing counsel (.2); Review additional paralegal redactions and send to client (.3); Internal correspondence re: protective order (.3).
12/23/2019	Cara E. Greene	CEG	0.6	\$950.00	\$570.00	Draft protective order.
12/23/2019	Shira Gelfand	SZG	4.1	\$425.00	\$1,742.50	Correspondence with CEG (.2); Draft proposed protective order, edit and supplement with CEG changes (2.7); correspondence with opposing counsel (.3); Client correspondence (.1); review letter from SDNY re: mandatory mediation (.2) Correspondence with IT re: logistics for client download (.2); Review correspondence re: conflict and waiver (.4).
12/27/2019	Shira Gelfand	SZG	0.3	\$425.00	\$127.50	Review client correspondence (.1), internal correspondence with IT re: availability for document download (.2)
12/30/2019	Cara E. Greene	CEG	1.8	\$950.00	\$1,710.00	Meeting with client re document retrieval and case status (1.5); correspondence with JMS re OpEd (.3)
12/30/2019	Daniel Stromberg	DXS	0.2	\$875.00	\$175.00	Advise SXG re: client google drive export steps for production.
12/30/2019	Shira Gelfand	SZG	5.7	\$425.00	\$2,422.50	Draft list of search terms for disclosures (.5); Case management meeting with CEG (.3); Client meeting (2.1); Correspondence with opposing counsel (.3); Review opposing counsel's draft protective order, make notes and compare to our proposed order (1.8); Correspondence with client re: searching devices (.2); Correspondence with DXS re: downloading documents off google drive (.2); review correspondence re op ed (.2); Correspondence with IT re: download of computer (.1).
12/31/2019	Shira Gelfand	SZG	0.3	\$425.00	\$127.50	Correspondence with paralegals re FTP link (.2); Correspondence with client (.1)
01/02/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SXG and CEG re FTP link.
01/02/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Pull Order of Automatic Referral to Mediation from PACER and save to iManage
01/02/2020	Brian D. Kouassi	BDK	0.6	\$325.00	\$195.00	Pull documents client recently sent.
01/02/2020	Shira Gelfand	SZG	1.3	\$425.00	\$552.50	Correspondence with CEG (.1); Correspondence with DXS (.1); Correspondence with opposing counsel (.2); Review correspondence from client re FTP (.1); Review opposing counsel's edits to the proposed ESI stipulation (.8).
01/03/2020	Brian D. Kouassi	BDK	0.6	\$325.00	\$195.00	Rearrange client documents for ringtail production.
01/03/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Conference with SXO re uploading client documents to ringtail.
01/03/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SXO re uploading client documents to Ringtail for document production
01/03/2020	Cara E. Greene	CEG	0.8	\$950.00	\$760.00	Discovery meet and confer with opposing counsel.
01/03/2020	Daniel Stromberg	DXS	2.2	\$875.00	\$1,925.00	Review defendant edits to ESI protocol and prepare for meet and confer re: same (.7); meet and confer re: ESI protocol and protective order (.8); edit ESI protocol per meet and confer (.6); advise SCG re: production format for client LinkedIn profile (.1).
01/03/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Create new Nuix credentials for SXG.
01/03/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Add issue code to Nuix work book.

Rowe v. Google LLC
Case No. 19-cv-08655 (JHR)
Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
01/03/2020	Sara Olson	SXO	0.2	\$350.00	\$70.00	Correspondence with SXG re Nuix navigation and preparation for upcoming Plaintiff's production
01/03/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Correspondence with SXG re new Nuix credentials.
01/03/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Assign team members to Nuix work book.
01/03/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Restructure and save documents to case file.
01/03/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Telephone conference with CCA re client data ingestion.
01/03/2020	Sara Olson	SXO	1.1	\$350.00	\$385.00	Ingest client data to Nuix.
01/03/2020	Sara Olson	SXO	0.3	\$350.00	\$105.00	Correspondence with BDK re client data discovery.
01/03/2020	Sara Olson	SXO	0.2	\$350.00	\$70.00	Create new case book on Nuix.
01/03/2020	Sara Olson	SXO	1.2	\$350.00	\$420.00	Ingest additional client data to Nuix.
01/03/2020	Shira Gelfand	SZG	4.9	\$425.00	\$2,082.50	Correspondence with paralegals and e-discovery team (.3); Begin reviewing client documents to prepare for initial disclosures (2.8); Call with opposing counsel (.9); Case management meeting with CEG (.2); Prepare and send updated draft protective order to opposing counsel (.4); Correspondence with client (.1); Correspondence with DXS re: ESI protocols (.2).
01/06/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondence with ringtail administrators re uploading recent client document production
01/06/2020	Christopher C. Alter	CCA	0.9	\$325.00	\$292.50	Ingest client documents to Nuix; correspondence with team re same.
01/06/2020	Christopher C. Alter	CCA	0.1	\$325.00	\$32.50	Begin preparing plaintiff production in Nuix; correspondence with team re same
01/06/2020	Cara E. Greene	CEG	2.8	\$950.00	\$2,660.00	Review documents for production, review and edit initial disclosures
01/06/2020	Daniel Stromberg	DXS	0.1	\$875.00	\$87.50	Advise team and SXG re: workflow for client ESI production QC review of PDFs then load file production
01/06/2020	Shira Gelfand	SZG	6.3	\$425.00	\$2,677.50	Continue document review to prepare for initial production (2.1); Draft rule 26 initial disclosures (1.3); Correspondence with paralegals and Ringtail admins re: additional documents and 1/7 production (.3) Download of documents, send to CEG for review (.4); Edit and supplement SDNY Initial disclosures, review documents to mark for confidentiality, and correspondence with CEG (2.2).
01/07/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondence with SXG re sending document production to client for their review
01/07/2020	Brian D. Kouassi	BDK	1.2	\$325.00	\$390.00	Compile documents for client's review before sending production over to the defense
01/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Send document production to client.
01/07/2020	Brian D. Kouassi	BDK	0.9	\$325.00	\$292.50	Draft transmittal letter to send discovery production to opposing counsel.
01/07/2020	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Compile documents in ringtail for production to opposing counsel
01/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SXG re document production and bringing in BXS to send documents to opposing counsel
01/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with BXS re sending Plaintiff's production to opposing counsel
01/07/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Finalize Plaintiff's production to opposing counsel.
01/07/2020	Christopher C. Alter	CCA	0.1	\$325.00	\$32.50	Conference with BXX re plaintiff production details.
01/07/2020	Christopher C. Alter	CCA	1.2	\$325.00	\$390.00	Prepare plaintiff production in Nuix; correspondence with team re same
01/07/2020	Cara E. Greene	CEG	0.7	\$950.00	\$665.00	Finalize and serve initial disclosures and documents.
01/07/2020	Shira Gelfand	SZG	5.8	\$425.00	\$2,465.00	Correspondence with CEG (.2); Correspondence with client (.3); Correspondence with paralegal and ESI team to prepare production, prepare FTP for client review (.3); Edit and supplement transmittal letter (.3); finalize and review documents in Nuix (.7); correspondence with opposing counsel re: protective order (.3); Edit and supplement disclosures, correspondence with CEG and paralegals re: FTP, finalize and send to opposing counsel (3.7).
01/08/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SXG re downloading the Defendants document production
01/08/2020	Brian D. Kouassi	BDK	1.4	\$325.00	\$455.00	Oversee issues re the download of document production from Defendants
01/08/2020	Christopher C. Alter	CCA	1.4	\$325.00	\$455.00	Import defendant production; correspondence with team, IT help re same
01/08/2020	Daniel Stromberg	DXS	0.5	\$875.00	\$437.50	Assess defendant production re: historical policy documents, email opposing counsel re: format issues (.4); email SXG re: client email production format (.1).
01/08/2020	Shira Gelfand	SZG	3.6	\$425.00	\$1,530.00	Correspondence with paralegal and ESI team re: Google's initial production and production format (.6); Correspondence with opposing counsel (.3); Begin review of documents and drafting issue codes re same (2.3) Correspondence with CEG and DXS (.4).
01/09/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SXG re producing Plaintiff's production in native format
01/09/2020	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Compile the native documents of Plaintiff's production for opposing counsel review
01/09/2020	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Send native Plaintiff's production to opposing counsel.
01/09/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Send Plaintiff's native production to opposing counsel's e-discovery expert.
01/09/2020	Christopher C. Alter	CCA	0.7	\$325.00	\$227.50	Correspondence with DXS, Nuix support re possible Defendant production issues
01/09/2020	Cara E. Greene	CEG	0.7	\$950.00	\$665.00	Correspondence with SZG, DXS re ESI production (.3); conference with SZG re litigation tasks (.4)
01/09/2020	Daniel Stromberg	DXS	1.4	\$875.00	\$1,225.00	Assess defendant production volume 1 deliverable and advise team re: format issues, coordinate investigation with Nuix and email opposing counsel re: same (.8); conference with SXG re: client document production format and workflow and confirm location and completeness of volume 1 (.6).
01/09/2020	Shira Gelfand	SZG	3.3	\$425.00	\$1,402.50	Correspondence with paralegal and Ringtail admins re: production (.4); Correspondence with CEG and DXS re production (.4); Review FTP load file (.3); Correspondence with opposing counsel re: production (.3); Draft issue codes for doc review (.6); Prepare agenda for case management meeting (.2); Case management meeting with CEG (.5); Begin drafting doc review memo (.4); Correspondence with opposing counsel re: production to Niles Rath (.2).
01/10/2020	Christopher C. Alter	CCA	4.6	\$325.00	\$1,495.00	Prepare Defendant production for import to Nuix; correspondence with DXS re same
01/10/2020	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Correspondence with client, JFS.
01/10/2020	Daniel Stromberg	DXS	0.3	\$875.00	\$262.50	Coordinate data handling and Nuix import of irregular defendant production format re: historical hr policy documents.
01/10/2020	Shira Gelfand	SZG	1.5	\$425.00	\$637.50	Correspondence re: op ed and weekly meeting (.3); Correspondence with opposing counsel re: protective order (.2); Continue drafting doc review memo (.8); Call with SDNY mediation office re assigned mediator (.2).
01/13/2020	Christopher C. Alter	CCA	2.7	\$325.00	\$877.50	Import Defendant production; index same; correspondence with team, Nuix support re same
01/13/2020	Daniel Stromberg	DXS	0.3	\$875.00	\$262.50	Coordinate import of defendant ESI production.
01/13/2020	Shira Gelfand	SZG	3.2	\$425.00	\$1,360.00	Correspondence with client (.1); Correspondence with CEG re: RFP and doc review memo (.1); Finish drafting document review memo, send to CEG for review (1.7); Review opposing counsel's edits to proposed protective order (.8); Correspondence with opposing counsel (.2); Prepare agenda for call with client (.3).
01/14/2020	Christopher C. Alter	CCA	0.9	\$325.00	\$292.50	Import overlay for Defendant production to update pages in Nuix; correspondence with Nuix support re same
01/14/2020	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Telephone call with client.
01/14/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Correspondence with CCA re Defendant's production import file types.
01/15/2020	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Conference with JB re coordination of claims (.1); review document review memo (.3)
01/15/2020	Shira Gelfand	SZG	0.9	\$425.00	\$382.50	Correspondence with CEG re: RFP and doc review memo (.1); Review CEG edits to doc review memo, make relevant changes, correspondence with Ringtail admins re same (.8).
01/16/2020	Christopher C. Alter	CCA	0.2	\$325.00	\$65.00	Review and revise issue codes in Nuix casebook; correspondence with team re same.
01/16/2020	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Meet with SZG re discovery requests.
01/16/2020	Sara Olson	SXO	0.2	\$350.00	\$70.00	Add issue codes to Nuix work book.
01/16/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Correspondence with team re issue codes and coding documents on Nuix.
01/16/2020	Shira Gelfand	SZG	2.5	\$425.00	\$1,062.50	Correspondence with opposing counsel (.2); Prepare for case management meeting (.2); Case management meeting with CEG (.5); Begin document review (1.2); Correspondence with DXS and CEG re: ESI sources (.2) Email with o/c re: mediation (.2);.

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
01/17/2020	Daniel Stromberg	DXS	1.2	\$875.00	\$1,050.00	Draft list of defendant ESI sources to discuss in meet and confer (.2); review CEG email re: discovery on discovery issues and draft ESI sources issues and questions (.3); conference with SXM re: defendant production format issues (.2); draft summary email to opposing counsel re: production format issues (.2); draft meet and confer agenda re: ESI sources (.3).
01/17/2020	Sara Olson	SXO	0.2	\$350.00	\$70.00	Correspondence with SG re document view in Nuix.
01/17/2020	Sara Olson	SXO	0.2	\$350.00	\$70.00	Add issue code to Nuix work book.
01/17/2020	Shira Gelfand	SZG	6.9	\$425.00	\$2,932.50	Call with DXS and correspondence with Ringtail team to discuss ESI formatting issues (.3); Correspondence with DXS and CEG re: ESI sources for call with opposing counsel (.2); Draft email to opposing counsel re: ESI protocol, mediation, and protective order (.4); Email with client (.1); Document review (5.2) Compilation of relevant documents for CEG review (.7).
01/20/2020	Shira Gelfand	SZG	5.7	\$425.00	\$2,422.50	Continue document review (5.4); correspondence with CEG (.1) correspondence with opposing counsel (.1) correspondence with Ringtail team re doc review (.2).
01/21/2020	Cara E. Greene	CEG	1.2	\$950.00	\$1,140.00	Finalize discovery requests.
01/21/2020	Daniel Stromberg	DXS	0.3	\$875.00	\$262.50	Advise team re: Nuix sorting by document title and subject lines.
01/21/2020	Sara Olson	SXO	0.2	\$350.00	\$70.00	Telephone conference with SXG re how to code multiple documents on Nuix
01/21/2020	Sara Olson	SXO	0.2	\$350.00	\$70.00	Train SXG re how to batch code documents on Nuix.
01/21/2020	Shira Gelfand	SZG	8.1	\$425.00	\$3,442.50	Continue document review (4.7); call with client (.2); correspondence with CEG (.4); review client edits (.3); edit and supplement RFP and send to opposing counsel (.8); correspondence with Ringtail admins re document formatting (.2) correspondence with opposing counsel and mediation office re scheduling (.2); Draft initial interrogatories, send to CEG for review (1.3).
01/22/2020	Shira Gelfand	SZG	4.8	\$425.00	\$2,040.00	Review Google's request for production and Interrogatories (1.2); begin drafting response (.7) correspondence with client (.2); document review (2.3); review correspondence from mediator (.2) correspondence with opposing counsel (.2).
01/23/2020	Daniel Stromberg	DXS	0.6	\$875.00	\$525.00	Conference with SXG re: identification of duplicate defendant documents (.2); assess potential duplicate documents and advise SXO re: sort options in nuix (.4).
01/23/2020	Sara Olson	SXO	0.3	\$350.00	\$105.00	Correspondence with team re setting up duplication document review on Nuix
01/23/2020	Shira Gelfand	SZG	6.6	\$425.00	\$2,805.00	Email with opposing counsel (.1); email and call with Ringtail team and DXS re production issues (.4); continue drafting responses to Google's RFP (2.3); continue document review, email significant documents to CEG (3.8).
01/24/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re case overview meeting.
01/24/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re downloading Defendant's recent document production and uploading them on Ringtail.
01/24/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail administrators re uploading Defendant's recent document production
01/24/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Download Defendant's document production.
01/24/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondence with Ringtail Administrators re issues with uploading Defendants' recent document production
01/24/2020	Christopher C. Alter	CCA	1.4	\$325.00	\$455.00	Import Defendant production to Nuix; correspondence with team re same.
01/24/2020	Shira Gelfand	SZG	4.1	\$425.00	\$1,742.50	Review correspondence from opposing counsel re: additional production (.1); Correspondence with counsel re: ESI protocol and protective order, review SDNY rules re same (.4); Correspondence with Ringtail team re production (.2); document review (3.4).
01/27/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Conference with SZG re case overview and upcoming deadline.
01/27/2020	Shira Gelfand	SZG	4.7	\$425.00	\$1,997.50	Case management meeting with CEG (.3); Review correspondence from opposing counsel, review protective order and SDNY rules (.7); correspondence with client (.1); meeting with BK re: case updates and tasks (.4); Begin drafting mediation statement (3.2).
01/28/2020	Christopher C. Alter	CCA	3.5	\$325.00	\$1,137.50	Import Defendant productions to Nuix; correspondence with team re same.
01/28/2020	Shira Gelfand	SZG	6.3	\$425.00	\$2,677.50	Preparation for client call (.1); Client call (.2); Correspondence with CEG (.1); Correspondence with opposing counsel re discovery (.3); Continue drafting mediation statement and conducting research re same (3.4); Review Ringtail for docs re: Google employees, draft email to client re same (.4); Review ECF notice from SDNY (.1) Begin drafting Plaintiff's responses to D's interrogatories (1.7).
01/29/2020	Christopher C. Alter	CCA	1.3	\$325.00	\$422.50	Import Defendant production to Nuix; correspondence with team re same.
01/29/2020	Shira Gelfand	SZG	4.7	\$425.00	\$1,997.50	Review correspondence from opposing counsel, review referenced filings (.4); Edit and supplement mediation statement, send to CEG for review (.7); Begin drafting joint status letter to court (2.3); Edit and supplement interrogatories, send to CEG for review (.6); Correspondence with Ringtail team re: production and missing native files (.3) review of additional documents from Defendants (.4).
01/30/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re Google Written Responses per Employment Protocols.
01/30/2020	Daniel Stromberg	DXS	0.2	\$875.00	\$175.00	Troubleshoot Nuix adding document permissions with SXO.
01/31/2020	Shira Gelfand	SZG	2.2	\$425.00	\$935.00	Continue doc review of Prod 002.
02/03/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re mediation statement.
02/03/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re mediation statement.
02/03/2020	Cara E. Greene	CEG	0.9	\$950.00	\$855.00	Correspondence with opposing counsel re disclosures (.2); edit status letter to the court (.7)
02/03/2020	Shira Gelfand	SZG	8.2	\$425.00	\$3,485.00	Review correspondence from client, including responses to interrogatories (.4); Prepare for case management meeting (.2); Case management meeting with CEG (.3); Correspondence with opposing counsel (.3); Edit and supplement joint status letter, send to o/c (.4); Review opposing counsel edits to joint status letter, supplement and send to CEG for review (.8); Continue drafting response to interrogatories (.7); Edit and supplement mediation statement (2.3) finalize edits to new version of joint status letter and protective order and send to opposing counsel (.5); correspondence with paralegals re: filing (.2); Review final joint status letter with opposing counsel edits, finalize, send to CEG for review, correspondence with BXS, send to paralegal for filing, review filing (2.1).
02/04/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re mediation statement.
02/04/2020	Brian D. Kouassi	BDK	0.8	\$325.00	\$260.00	Revise cash flow charts for mediation statement to the court.
02/04/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Meeting with SZG re case updates.
02/04/2020	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Telephone call with client re work status.
02/04/2020	Shira Gelfand	SZG	5.5	\$425.00	\$2,337.50	Edit and supplement mediation statement, review documents to include as exhibits (4.7); Correspondence with CEG (.2); Review letter from court re: initial disclosures, flag deadline (.3); Meeting with BXK re outstanding tasks (.2); review correspondence with client (.1).
02/05/2020	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Pull docket documents and save them to firm's database.
02/05/2020	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Telephone call with client, opposing counsel re rescheduling mediation
02/05/2020	Shira Gelfand	SZG	4.6	\$425.00	\$1,955.00	Edit and supplement mediation statement and review relevant documents in ringtail (2.3); Continue drafting responses and objections to interrogatories (1.8); Correspondence with opposing counsel (.2); correspondence with CEG (.1); case management meeting with CEG (.2).
02/06/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re case updates.
02/06/2020	Brian D. Kouassi	BDK	0.9	\$325.00	\$292.50	Compile relevant documents from Defendants' production and send to the client
02/06/2020	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence with opposing counsel re mediation.
02/06/2020	Shira Gelfand	SZG	4.6	\$425.00	\$1,955.00	Correspondence with opposing counsel (.2); Prep for Case management meeting (.2); Case management meeting (.3); Call with client (.4); Review individual court rules, Draft letter re extension to court, send to CEG for review (1.2); Correspondence with paralegal and RT admin re: FTP of hot docs to client (.3); Final review of relevant documents (176) in RT for FTP, send instructions to paralegals (1.3); call and email with mediator and mediation office (.4) Review FTP in Y drive and draft letter from paralegal (.3).
02/07/2020	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	File Letter Motion for Extension of Time to Complete Mediation to the Court

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
02/07/2020	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Review and file extension for mediation.
02/07/2020	Cara E. Greene	CEG	1.1	\$950.00	\$1,045.00	Edit discovery requests and interrogatories.
02/07/2020	Shira Gelfand	SZG	3.5	\$425.00	\$1,487.50	Edit and supplement letter to court, prepare for filing, correspondence with paralegal, finalize and file (.8); Meeting with client (1.3); Case management meeting (.2); Correspondence with opposing counsel (.2) Correspondence with mediator (.1); Correspondence with DXS (.1); Edit and supplement responses to interrogatories (1.6).
02/09/2020	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence with client re discovery requests.
02/10/2020	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Download documents sent from client to be uploaded to database.
02/10/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Download Order from Judge Schofield granting Motion for Extension of Time
02/10/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Conference with SZG re case updates.
02/10/2020	Christopher C. Alter	CCA	0.5	\$325.00	\$162.50	Ingest client documents to Nuix; correspondence with team re same.
02/10/2020	Daniel Stromberg	DXS	0.2	\$875.00	\$175.00	Advise SXG re: client document production assembly coding, create issue for RFP response production assembly
02/10/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Review correspondence with team re client data ingestions on Nuix.
02/10/2020	Shira Gelfand	SZG	7.3	\$425.00	\$3,102.50	Review correspondence from client and additional documents (.3); Review answers to interrogatories from client (.2); Correspondence with CEG (.2); Meeting with paralegal (.2); Correspondence with Ringtail team re: additional documents and upcoming production (.3); Review letter from Judge (.2); Edit and supplement request for interrogatories (.8); Edit and supplement plaintiff's response to interrogatories (1.3); Review Defendant's RFP and Begin review of documents to respond to RFPs (3.6); draft email to CEG re outstanding documents (.2).
02/11/2020	Christopher C. Alter	CCA	0.1	\$325.00	\$32.50	Correspondence with team re searching for documents in Nuix.
02/11/2020	Cara E. Greene	CEG	1.2	\$950.00	\$1,140.00	Review and edit document request responses, correspondence with client re same; correspondence re interrogatories.
02/11/2020	Daniel Stromberg	DXS	0.5	\$875.00	\$437.50	Advise SXG re: filtering produced client documents from future productions (.1); coordinate meet and confer roles and strategy with SXG (.1); email CEG and SXG re: client ESI sources re: meet and confer preparation (.3).
02/11/2020	Shira Gelfand	SZG	6.7	\$425.00	\$2,847.50	Correspondence with client (.2); Continue searching documents and review of new uploads in Ringtail and prepare for upcoming production (2.1); Correspondence with paralegal and ringtail team re: production (.3); Correspondence with opposing counsel (.2); Correspondence with DXS and CEG re: client ESI practices, review past meeting notes for information on ESI practices (.4); Edit and supplement plaintiff's interrogatories (.6); Edit, supplement, and review of responses to RFP (1.1); Correspondence with CEG re same (.2); Edit and supplement responses to interrogatories (.4); Finalize and proofread responses to RFP and interrogatories, send to opposing counsel (1.2).
02/12/2020	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Phone conference with SZG, DS, and opposing counsel re ESI protocol
02/12/2020	Daniel Stromberg	DXS	3.1	\$875.00	\$2,712.50	Review correspondence to prepare for meet and confer re: esi sources (.9); email with SXG re: ESI meet and confer strategy (.2); conference with SXG to prepare for ESI meet and confer (.1); review defendant production format issues re: meet and confer (.3); meet and confer with opposing counsel and defendant re: ESI sources (1.1); post meet and confer call with SXG (.1); investigate defendant load files missing data and email opposing counsel per meet and confer to request replacements (.4).
02/12/2020	Shira Gelfand	SZG	4.1	\$425.00	\$1,742.50	Correspondence with DXS re: ESI questions from opposing counsel (.3); Preparation for call with Google counsel (.3); Call with Google Counsel (1.1); Call with DXS debriefing and discussing next steps (.1); Email correspondence with Google re production (.1); Correspondence with CEG re: outstanding issues and production (.3); Correspondence with Ringtail team re: doc review issues(.2); Review Google's responses to our Request for Production (1.7).
02/13/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Pull docket documents re Court's order.
02/13/2020	Sara Olson	SXO	0.2	\$350.00	\$70.00	Correspondence with SZG re batch print document error code issue
02/13/2020	Sara Olson	SXO	0.2	\$350.00	\$70.00	Address Nuix batch print document error code issue.
02/13/2020	Shira Gelfand	SZG	0.6	\$425.00	\$255.00	Correspondence with ringtail team re: documents for production (.2); correspondence with CEG (.1); Review filing from court re mediation (.3).
02/18/2020	Shira Gelfand	SZG	0.4	\$425.00	\$170.00	Correspondence with opposing counsel (.2); Correspondence with client (.2)
02/19/2020	Shira Gelfand	SZG	1.3	\$425.00	\$552.50	Edit and supplement plaintiff's responses to interrogatories, review relevant portions of complaint, send to CEG for review (1.3).
02/20/2020	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence with SZG re interrogatories.
02/20/2020	Shira Gelfand	SZG	1.8	\$425.00	\$765.00	Correspondence with client and review attached article re: Tariq Shaukrat (.3); Correspondence with CEG re: responses to interrogatories (.1); Edit and finalize responses to interrogatories, send to client to sign and send to opposing counsel (1.4).
02/24/2020	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Telephone call with J. Burt re potential conflicts.
02/24/2020	Shira Gelfand	SZG	0.5	\$425.00	\$212.50	Correspondence with CEG (.1); Correspondence with client (.1); Prepare agenda for client call (.3)
02/25/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Telephone call with client to discuss case and work updates.
02/25/2020	Shira Gelfand	SZG	0.7	\$425.00	\$297.50	Call with client and CEG (.5); Correspondence with client (.2)
02/26/2020	Christopher C. Alter	CCA	0.1	\$325.00	\$32.50	Correspondence with Nuix team re addressing comparison question from case team.
02/26/2020	Daniel Stromberg	DXS	0.4	\$875.00	\$350.00	Advise SXG re: removal of previously produced documents from client production population (.2); manually identify and remove same (.1); conference with SXG re: same and re: coding families consistently for production (.1).
02/26/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Review correspondence with team re comparing documents re written discovery on Nuix
02/26/2020	Shira Gelfand	SZG	1.8	\$425.00	\$765.00	Review documents in Ringtail for production, correspondence with DXS re same (1.6); Correspondence with client (.2).
02/27/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SXO re case memo.
02/27/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Meeting with SZG re case updates and new deadlines.
02/27/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Download Defendant's recent document production.
02/27/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondence with SXO re Plaintiff's documents in review system.
02/27/2020	Christopher C. Alter	CCA	0.1	\$325.00	\$32.50	Correspondence with SXG re Nuix coding steps.
02/27/2020	Christopher C. Alter	CCA	1.0	\$325.00	\$325.00	Import Defendant production to Nuix; correspondence with team re same.
02/27/2020	Christopher C. Alter	CCA	0.1	\$325.00	\$32.50	Telephone conference with SXG re upcoming production.
02/27/2020	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Case management meeting with SZG.
02/27/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Extract zipped production from case file.
02/27/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Correspondence with team re Defendant's production and drafting case memo.
02/27/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Prepare for Plaintiff's production on Nuix; correspondence with team re same
02/27/2020	Sara Olson	SXO	0.2	\$350.00	\$70.00	Download coded documents for written discovery responses for CXG.
02/27/2020	Shira Gelfand	SZG	3.4	\$425.00	\$1,445.00	Prepare agenda for meeting (.3); Case management meeting with CEG (.5); draft supplemental initial disclosures (1.4); correspondence with opposing counsel (.4); review of ESI stipulation (.8).
02/28/2020	Brian D. Kouassi	BDK	0.7	\$325.00	\$227.50	Compile Plaintiff's production for CEG's review.
02/28/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Update BDK Nuix credentials.
02/28/2020	Shira Gelfand	SZG	5.1	\$425.00	\$2,167.50	Correspondence with opposing counsel (.1); correspondence with BK (.2); review of documents for production (.6) correspondence with CEG (.1); correspondence with Ringtail team re additional production from defendants (.4); begin drafting deficiency chart (3.7).
02/29/2020	Shira Gelfand	SZG	2.7	\$425.00	\$1,147.50	Draft deficiency chart.
03/02/2020	Christopher C. Alter	CCA	0.3	\$325.00	\$97.50	Research in Nuix re defendant produced excel documents; correspondence with SXG re same
03/02/2020	Christopher C. Alter	CCA	0.6	\$325.00	\$195.00	Review productions in Nuix casebook re possible duplicates; correspondence with SXG re same
03/02/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Review correspondence with SZG re policies and procedures on Nuix

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03/02/2020	Shira Gelfand	SZG	5.4	\$425.00	\$2,295.00	Doc review (4.8); Correspondence with CEG (.2); correspondence with client (.1); Correspondence with Ringtail team re documents (.3).
03/03/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Compile Plaintiff's production and send discovery to client.
03/03/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondence with client re documents.
03/03/2020	Brian D. Kouassi	BDK	1.9	\$325.00	\$617.50	Compile discovery and send plaintiff's discovery to Opposing Counsel
03/03/2020	Christopher C. Alter	CCA	0.8	\$325.00	\$260.00	Prepare plaintiff production; correspondence with team, DXS re same
03/03/2020	Cara E. Greene	CEG	2.3	\$950.00	\$2,185.00	Review mediation statement (.5); conference with SZG re discovery deficiencies (.5); meet and confer call with opposing counsel (1.0); review deficiency chart (.3).
03/03/2020	Shira Gelfand	SZG	11.6	\$425.00	\$4,930.00	Correspondence with DXS (.2); Correspondence with CEG (.7); edit and supplement deficiencies chart (1.2); Prepare agenda for call with Paul Hastings (.2); Attention to document review and initial disclosures (1.2) Correspondence with mediator (.3); Case management meeting and Prep with call with opposing counsel (.5) Call with Paul Hastings (1.0); Prepare supplemental initial disclosures, correspondence with client, correspondence with paralegal, correspondence with Ringtail team, correspondence with CEG, call with client, review of documents, attention to redaction of third parties (6.3).
03/04/2020	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Correspondence with Ringtail Admins re coding issues.
03/04/2020	Brian D. Kouassi	BDK	2.4	\$325.00	\$780.00	Compile production for attorneys review.
03/04/2020	Cara E. Greene	CEG	2.6	\$950.00	\$2,470.00	Client meeting to discuss discovery and mediation (1.8); finalize mediation statement (.8).
03/04/2020	Daniel Stromberg	DXS	0.2	\$875.00	\$175.00	Coordinate client load file production creation to match pdf sort order
03/04/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Conference with SZG regarding case background and strategy.
03/04/2020	Sara Olson	SXO	0.2	\$350.00	\$70.00	Export load files for Plaintiff's productions on Nuix
03/04/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Download and save Plaintiff's production export load files from Nuix to case file
03/04/2020	Sara Olson	SXO	0.2	\$350.00	\$70.00	Telephone conference with BDK re manual Plaintiff's production redactions on case file
03/04/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Correspondence with DXS re reconciling Plaintiff's production redactions and load files on case file and Nuix
03/04/2020	Sara Olson	SXO	0.3	\$350.00	\$105.00	Download and quality check Plaintiff's productions load files
03/04/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Correspondence with BSS for Nuix redaction task for available staff.
03/04/2020	Sara Olson	SXO	0.2	\$350.00	\$70.00	Unlock Plaintiff's production and reset for properly coded metadata on Nuix
03/04/2020	Shira Gelfand	SZG	4.9	\$425.00	\$2,082.50	Preparation for meeting (.5); Client meeting with CEG (2.0); Begin drafting letter to opposing counsel re: deficiencies in production (1.3); Correspondence with client (.1); Correspondence with Ringtail team re: redacting metadata for production (.3); Correspondence with paralegal re binder (.2) Correspondence with mediator (.1); correspondence with opposing counsel (.4).
03/05/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re sending her case information.
03/05/2020	Brian D. Kouassi	BDK	1.2	\$325.00	\$390.00	Compile documents for counsel's review.
03/05/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SXO re production to Opposing Counsel.
03/05/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondence with SZG and SXO re production to Opposing Counsel
03/05/2020	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Correspondence with client re production, correspondence with SZG re letter to opposing counsel
03/05/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Review mediation statement.
03/05/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Telephone conference with SZG and BDK re Plaintiff's production preparation on Nuix
03/05/2020	Sara Olson	SXO	0.2	\$350.00	\$70.00	Save document to case file.
03/05/2020	Sara Olson	SXO	0.3	\$350.00	\$105.00	Draft and circulate FTP message to Defendants to SZG for review and approval with Plaintiff's production package
03/05/2020	Sara Olson	SXO	0.6	\$350.00	\$210.00	Prepare Plaintiff's production on Nuix.
03/05/2020	Sara Olson	SXO	0.2	\$350.00	\$70.00	Telephone conference with SZG re re-production of Plaintiff's documents
03/05/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Circulate Plaintiff's production set to SZG for approval to send to Defendants
03/05/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Correspondence with BDK re reproducing Plaintiff's documents.
03/05/2020	Sara Olson	SXO	0.3	\$350.00	\$105.00	Follow-up with SZG re exporting load files on manual Plaintiff's productions and
03/05/2020	Sara Olson	SXO	1.6	\$350.00	\$560.00	Reproduce Plaintiff's productions on Nuix. (1) Correspondence with SZG re Plaintiff's production. (.5) Resend Plaintiff's production set to Defendants. (1).
03/05/2020	Shira Gelfand	SZG	7.3	\$425.00	\$3,102.50	Correspondence with mediator (.2); Review mediation statement (.4); Correspondence with CEG (.2); Correspondence with client re documents (.3); Meeting with MXJ re: case (.6); Correspondence with BK (.2) Call with client (.2); Correspondence with RT admins (.3); Designate appropriate documents, remove redactions, and prepare for production, conduct final review (4.6); Correspondence with opposing counsel (.2); Review correspondence re additional files from client (.2); Correspondence with CEG (.2).
03/06/2020	Christopher C. Alter	CCA	1.2	\$325.00	\$390.00	Prepare plaintiff production in Nuix; correspondence with team re same
03/06/2020	Christopher C. Alter	CCA	0.7	\$325.00	\$227.50	Ingest client documents to Nuix; correspondence with team re same.
03/06/2020	Daniel Stromberg	DXS	0.3	\$875.00	\$262.50	Conference with MSJ and SXG re: defendant ESI search term proposal.
03/06/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference with SXG/DXS regarding search terms and custodians.
03/06/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Receipt & review of correspondence from SZG regarding deficiency letter
03/06/2020	Sara Olson	SXO	0.4	\$350.00	\$140.00	Draft and send Plaintiff's productions FTP package to Defendants.
03/06/2020	Sara Olson	SXO	1.1	\$350.00	\$385.00	Ingest client data to Nuix.
03/06/2020	Shira Gelfand	SZG	7.2	\$425.00	\$3,060.00	Review of documents in Ringtail (1.6); Correspondence with Ringtail team (.4); Correspondence with paralegals (.2); correspondence with CEG (.1) Calls with MXJ (.2); Call with DXS (.2); Correspondence with CEG (.2); correspondence with paralegals (.2); Final review of documents in Y drive, prep for production (1.2); Continue drafting deficiency letter, conduct research, send to CEG for review (2.9).
03/08/2020	Shira Gelfand	SZG	3.3	\$425.00	\$1,402.50	Begin drafting ESI search terms and custodians and review relevant documents (3.3).
03/09/2020	Christopher C. Alter	CCA	0.1	\$325.00	\$32.50	Add MXJ to casebook in Nuix.
03/09/2020	Cara E. Greene	CEG	1.0	\$950.00	\$950.00	Case management meeting with SZG (.5); telephone call with client (.5).
03/09/2020	Cara E. Greene	CEG	2.5	\$950.00	\$2,375.00	Prepare for mediation and correspondence with opposing counsel (1.8); meeting with SZG and MJ (.2); telephone call with client to discuss damages calculations (.5).
03/09/2020	Maya S. Jumper	MSJ	1.0	\$475.00	\$475.00	Conference call with client re preparation for mediation, damages calculations and case strategy
03/09/2020	Maya S. Jumper	MSJ	1.5	\$475.00	\$712.50	Conference with CEG/SZG regarding preparation for mediation.
03/09/2020	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Review ESI search term proposal.
03/09/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Review correspondence regarding attendance at mediation.
03/09/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from CEG regarding comparator information and preparation for mediation
03/09/2020	Shira Gelfand	SZG	6.1	\$425.00	\$2,592.50	Edit and supplement ESI search terms, send to CEG/MXJ (.8); Correspondence with and CEG MXJ (.3); Correspondence with opposing counsel (.3); Prepare agenda for team meeting (1.5); review damages calculation (.4); Meeting with MXJ (.3); Call with Ulku and team call (1.1); Attention to damages calculation (.1); review new production from opposing counsel, prepare chart, correspondence with paralegal, review documents in Ringtail (2.3).
03/10/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Download documents sent by Opposing Counsel.
03/10/2020	Cara E. Greene	CEG	4.2	\$950.00	\$3,990.00	Prepare for and attend mediation.
03/10/2020	Cara E. Greene	CEG	1.0	\$475.00	\$475.00	Travel to and from mediation (1/2 charge).
03/10/2020	Maya S. Jumper	MSJ	2.0	\$475.00	\$950.00	Attend mediation with CEG/SZG.
03/10/2020	Maya S. Jumper	MSJ	0.5	\$237.50	\$118.75	Travel to mediation.
03/10/2020	Maya S. Jumper	MSJ	0.5	\$237.50	\$118.75	Travel from mediation.
03/10/2020	Shira Gelfand	SZG	1.0	\$212.50	\$212.50	Travel to and from mediation.
03/10/2020	Shira Gelfand	SZG	3.5	\$425.00	\$1,487.50	Attend mediation (3.0); Correspondence with opposing counsel (.2); review op ed (.3)

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
03/11/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence SZG and opposing counsel regarding document production
03/12/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Download Opposing Counsel's production.
03/12/2020	Christopher C. Alter	CCA	1.8	\$325.00	\$585.00	Import Defendant productions to Nuix; correspondence with team re same.
03/12/2020	Cara E. Greene	CEG	2.0	\$950.00	\$1,900.00	Case management meeting (.5); telephone call with client re mediation and discovery (.5); discovery planning meeting (1.0).
03/12/2020	Maya S. Jumper	MSJ	1.6	\$475.00	\$760.00	Review and revise search terms.
03/12/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to SZG regarding correspondence to CEG regarding search terms and agenda
03/12/2020	Maya S. Jumper	MSJ	0.8	\$475.00	\$380.00	Conf call with client regarding next steps and case strategy.
03/12/2020	Maya S. Jumper	MSJ	0.8	\$475.00	\$380.00	Finalize meeting notes and save to file.
03/12/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding production.
03/12/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from opposing counsel regarding AEO/confidential designation
03/12/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with CEG/SZG regarding recap from mediation and next steps.
03/12/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Correspondence with CCA re downloading Defendant's production and decrypting on Nuix
03/12/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Correspondence with team re new Defendant's production for import to Nuix
03/12/2020	Shira Gelfand	SZG	5.1	\$425.00	\$2,167.50	Case Management Meeting CEG/SZG/MSJ (.5); Client Call (1.2) call with Ulku; MSJ/ CEG call re assignment allocation (.2); Email with client re: document retrieval (.3); Correspondence with paralegal and Ringtail admins re production (.2); Review of new production in RT, send email to CEG/ MSJ re same (2.7).
03/13/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG and MXJ re Opposing Counsel's responses to Interrogatories.
03/13/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondence with ringtail admins re pulling documents referenced in Opposing Counsel's responses to Plaintiff's interrogatories.
03/13/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admin regarding downloading production
03/13/2020	Christopher C. Alter	CCA	0.2	\$325.00	\$65.00	Correspondence with team re documents to pull from Nuix casebook for review
03/13/2020	Christopher C. Alter	CCA	0.4	\$325.00	\$130.00	Download documents from casebook; correspondence with team re same.
03/13/2020	Cara E. Greene	CEG	0.9	\$950.00	\$855.00	Case management meeting to discuss discovery and deficiency letter.
03/13/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with CEG/SZG regarding ESI strategy and next steps.
03/13/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence and review follow up correspondence to BXK regarding document pull and PDF assignment
03/13/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review Defendant's responses to ROGS.
03/13/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with CEG/SZG regarding case strategy and next steps.
03/13/2020	Shira Gelfand	SZG	7.1	\$425.00	\$3,017.50	Review defendants responses to interrogatories (.7); calls with MSJ (.8); case management meeting with CEG and MSJ (.5); draft deficiency letter (4.7); correspondence from opposing counsel (.2); correspondence with paralegal and Ringtail admins (.2).
03/14/2020	Shira Gelfand	SZG	1.3	\$425.00	\$552.50	Continue drafting deficiency letter.
03/15/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review draft deficiency letter.
03/15/2020	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Revise deficiency letter.
03/15/2020	Shira Gelfand	SZG	2.8	\$425.00	\$1,190.00	Continue drafting deficiency letter, review defendants responses to interrogatories and referenced documents (2.7); correspondence with MSJ (.1).
03/16/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ and SZG re deposition notices.
03/16/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Review and organize deadlines re deposition notices.
03/16/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG and MSJ re potential depositions.
03/16/2020	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Draft redaction log and pull all documents that were redacted during previous productions
03/16/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting.
03/16/2020	Daniel Stromberg	DXS	0.8	\$875.00	\$700.00	Review and edit draft ESI search term proposal and instructions.
03/16/2020	Daniel Stromberg	DXS	0.2	\$875.00	\$175.00	Advise SXG re: ESI protocol strategy and proposed edits.
03/16/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Coordinate redaction log assignment with BXK/SZG.
03/16/2020	Maya S. Jumper	MSJ	0.7	\$475.00	\$332.50	Draft correspondence to DXS regarding review of search terms; review edits and incorporate
03/16/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with CEG/SZG regarding next steps and case updates.
03/16/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to BXK regarding calendaring and deposition notices
03/16/2020	Maya S. Jumper	MSJ	3.4	\$475.00	\$1,615.00	Finalize deficiency letter.
03/16/2020	Shira Gelfand	SZG	4.4	\$425.00	\$1,870.00	Calls with MSJ (.3); correspondence with paralegal (.4); correspondence with MSJ and CEG (.2); draft list of individuals and job positions in defendants ROG responses (1.6) prepare agenda for team meeting (.3); case management meeting with CEG / MSJ (.5); debrief with MSJ (.2); preparation for client call (.5); correspondence with DXS (.4).
03/17/2020	Brian D. Kouassi	BDK	1.6	\$325.00	\$520.00	Draft deposition notices for people to be deposed by the Plaintiff
03/17/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ and SZG re deposition notices.
03/17/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ and SZG re deposition notices.
03/17/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Telephone call with client re status, discovery.
03/17/2020	Maya S. Jumper	MSJ	0.7	\$475.00	\$332.50	Circulate search terms to client and incorporate edits.
03/17/2020	Shira Gelfand	SZG	5.6	\$425.00	\$2,380.00	Preparation for call with client (.6) call with client (.5) ; send email to client re individuals in defendant responses to ROGS (.2) correspondence with MSJ and CEG re depositions (.3); correspondence with BXK (.2); review deficiency letter (.7) begin drafting 30(b)(6) deposition notice and review documents in Ringtail re same (2.3); review updated search terms (.6); correspondence with opposing counsel (.2).
03/18/2020	Brian D. Kouassi	BDK	0.8	\$325.00	\$260.00	Download defendant's production and deal with issues related to defendant's production
03/18/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondence with ringtail admins re defendant's production issues.
03/18/2020	Christopher C. Alter	CCA	0.8	\$325.00	\$260.00	Import Defendant production to Nuix; correspondence with team re same.
03/18/2020	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Review information re comp comparison and correspondence re same
03/18/2020	Daniel Stromberg	DXS	0.3	\$875.00	\$262.50	Assess defendant productions and advise SXG re: identifying documents designated as attorneys eyes only.
03/18/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from CEG regarding scheduling.
03/18/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review draft 30b6 deposition notice.
03/18/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review comp compare chart.
03/18/2020	Sara Olson	SXO	0.2	\$350.00	\$70.00	Correspondence with team re identifying dat files in Defendant's productions
03/18/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Correspondence with BDK re link version letter sent from Defendants re document production
03/18/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Correspondence with team re Defendant's productions.
03/18/2020	Shira Gelfand	SZG	4.9	\$425.00	\$2,082.50	Correspondence with client(.3); attention to issues related to newest production and correspondence with opposing counsel re same (.4); finalize first draft of 30(b)(6) notice and send to CEG and MSJ (1.3); review updates production and compare with previously produced documents, correspondence with CEG and MSJ re same (1.7); review of comparator compensation, protective order and AEO docs (1.2).
03/19/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re redaction log.
03/19/2020	Cara E. Greene	CEG	2.7	\$950.00	\$2,565.00	Review and edit meet and confer letter and conference with SZG, MJ re same.
03/19/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review file to prepare for conference with CEG/SZG.
03/19/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with CEG/SZG regarding case updates and next steps.
03/19/2020	Maya S. Jumper	MSJ	1.3	\$475.00	\$617.50	Reivew and revise ESI search terms.
03/19/2020	Maya S. Jumper	MSJ	0.9	\$475.00	\$427.50	Review and incorporate CEG edits.
03/19/2020	Shira Gelfand	SZG	6.1	\$425.00	\$2,592.50	Correspondence with MSJ (.1); create agenda for meeting (.5); review correspondence from client (.2); case management meeting with CEG and MSJ (.9); edit and supplement deficiency letter, conduct research re same, review ESI search terms (4.4).
03/20/2020	Brian D. Kouassi	BDK	1.4	\$325.00	\$455.00	Review and edit documents re production to opposing counsel.

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
03/20/2020	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Draft Notice of Appearances for MSJ and SZG for the SDNY.
03/20/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with JXL, BXS, SZG and MSJ re creating accounts for SZG and MSJ in the SDNY in order to file the Notice of Appearance.
03/20/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with BXS re creating accounts for SZG and MSJ in the SDNY in order to file the Notice of Appearance.
03/20/2020	Brian D. Kouassi	BDK	0.6	\$325.00	\$195.00	Finalize SDNY Notice of Appearances for SZG and MSJ and request creation of pacer accounts for SZG and MSJ
03/20/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Download and save recent docket filing from Court Clerk re Mediator Report
03/20/2020	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Case management meeting with SZG, MJ.
03/20/2020	Daniel Stromberg	DXS	0.1	\$875.00	\$87.50	Advise SXG re: ESI custodial negotiation strategy re: multiple custodians for same position over time
03/20/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review NOA and correspondence from BK regarding NOA.
03/20/2020	Shira Gelfand	SZG	7.1	\$425.00	\$3,017.50	Edit and supplement ESI search terms and letter (3.8); call with MSJ (.3) call with CEG (.5); correspondence with BK re NOA (.2) doc review of additional documents for inclusion into ESI search terms and letter (2.3).
03/23/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Weekly meeting re case updates with MSJ and SZG.
03/23/2020	Brian D. Kouassi	BDK	0.7	\$325.00	\$227.50	Finalize draft Notices of Depositions and submit for review.
03/23/2020	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Input MSJ's edits re deposition notices.
03/23/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Produce Notice of Depositions into final format.
03/23/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ and SZG re draft deposition notices.
03/23/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ and SZG re draft deposition notices.
03/23/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ and SZG re draft deposition notices.
03/23/2020	Cara E. Greene	CEG	1.7	\$950.00	\$1,615.00	Continue editing deficiency letter and reviewing underlying requests and responses; edit ESI searches and 30(b)(6) notices.
03/23/2020	Daniel Stromberg	DXS	0.6	\$875.00	\$525.00	Review and edit draft ESI search term proposal and instructions.
03/23/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review notices and revise.
03/23/2020	Maya S. Jumper	MSJ	0.7	\$475.00	\$332.50	Conference call with SZG/CEG regarding discovery and next steps.
03/23/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference with BXC/SZG regarding case update and deposition notices.
03/23/2020	Maya S. Jumper	MSJ	0.7	\$475.00	\$332.50	Review and revise 30(b)(6) notice.
03/23/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to SZG regarding agenda allocation.
03/23/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from SZG regarding client document search and revise.
03/23/2020	Shira Gelfand	SZG	7.3	\$425.00	\$3,102.50	Prepare agenda for meeting(.4); case management meeting with CEG and MSJ (.5) call with MSJ (.2); call with MSJ and BXX (.3); review deposition notices and correspondence with MSJ and BXX (.7); draft list of searches for clients Google Drive and correspondence with MSJ (.8); correspondence with client and search for relevant documents in Ringtail (.7); edit and supplement deficiency letter and ESI search terms (3.3); correspondence with CEG (.2); call with MSJ (.2).
03/24/2020	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Finalize second version of deposition notices.
03/24/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re second drafts of deposition notices.
03/24/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG and MSJ re second set of deposition notices.
03/24/2020	Maya S. Jumper	MSJ	1.7	\$475.00	\$807.50	Review and finalize deficiency letter (1.0), deposition notices and ESI search terms and circulate to CEG/SZG (.7)
03/24/2020	Maya S. Jumper	MSJ	0.7	\$475.00	\$332.50	Conference with CEG/SZG and U. Rowe regarding discovery and case strategy.
03/24/2020	Shira Gelfand	SZG	3.4	\$425.00	\$1,445.00	Prep for call with client (.3) call with client (.6); correspondence with MSJ (.2); edit and supplement deficiency letter and ESI search terms, send to CEG and MSJ (2.3).
03/25/2020	Brian D. Kouassi	BDK	2.0	\$325.00	\$650.00	Multiple drafts of Notice of 30(b)(6) Depositions and Notice of 30(b) Depositions
03/25/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Finalize Notice of 30(b)(6) Depositions and Notice of 30(b) Depositions
03/25/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Compile exhibits for SZG's review.
03/25/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re compiling exhibits.
03/25/2020	Cara E. Greene	CEG	1.6	\$950.00	\$1,520.00	Telephone call with client re depositions, discovery (.5); edit letter (.4); update search terms (.4); update 30 (b)(6) deposition notice (.3).
03/25/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review and revise deposition notices.
03/25/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Conference call with BXC regarding deposition notices.
03/25/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Review draft correspondence to opposing counsel and attachments.
03/25/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to SZG regarding cover letter to ESI search terms.
03/25/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Conference with SZG regarding finalizing discovery papers.
03/25/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Correspondence with LIM regarding notice proposal and welcome letter.
03/25/2020	Shira Gelfand	SZG	7.4	\$425.00	\$3,145.00	Review MSJ edits to search terms, deficiency letter, and deposition notices (1.3); edit and supplement deficiency letter, ESI search terms, depo notices, and ESI protocol and send to opposing counsel (4.3); correspondence with CEG and MSJ and BXX re same (.8).
03/26/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re mailing out deposition notices.
03/26/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG and BS re mailing out deposition notices
03/26/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re mailing out deposition notices.
03/26/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting with SZG, MJ.
03/26/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Conference call with CEG/SZG depositions and next steps regarding discovery.
03/26/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Conference call with SZG regarding debrief from team call regarding depositions and discovery M&C
03/26/2020	Shira Gelfand	SZG	2.8	\$425.00	\$1,190.00	Prep agenda for case management meeting (.6); case management meeting (.5) debrief with MSJ (.2); review correspondence from opposing counsel (.1) draft proposed schedule for case extension (.8); correspondence with CEG re deposition notices (.2); correspondence with paralegals re depo notices (.4).
03/27/2020	Shira Gelfand	SZG	1.4	\$425.00	\$595.00	Review CEG materials re depo prep.
03/30/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re weekly meeting.
03/30/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Update weekly meeting.
03/30/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with BXS re Notice of Appearances for the SDNY.
03/30/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with BXS re Notice of Appearances for the SDNY.
03/30/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ and SZG re Notice of Appearances for the SDNY
03/30/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review and update case file.
03/30/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Conference with SZG regarding next steps and assignment allocation.
03/30/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference with CEG/SZG regarding case updates and next steps.
03/30/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to SZG regarding M&C scheduling.
03/30/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Receipt & review of correspondence from SZG regarding edits to agenda for client meeting
03/30/2020	Shira Gelfand	SZG	5.6	\$425.00	\$2,380.00	Preparation for case management meeting (.4); meeting with MSJ (.2); call with MSJ and CEG (.2); correspondence with BXX re notice of appearance (.2); correspondence with client (.2); prepare agenda for client call (.4); review CEG depo prep materials part 2 (1.2); review proposed change to scheduling order and judges rules (.3); review of deficiencies and RFPs for call with opposing counsel (2.3) correspondence with opposing counsel (.2).
03/31/2020	Cara E. Greene	CEG	0.7	\$950.00	\$665.00	Telephone call with client re discovery strategy (.5); case management meeting with MSJ (.2).
03/31/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Circulate discovery documents to client.
03/31/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with client/CEG/SZG regarding case updates and next steps.
03/31/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review file and draft correspondence to client regarding discovery documents
03/31/2020	Shira Gelfand	SZG	0.7	\$425.00	\$297.50	Prep for client call (.2); client call (.3); correspondence with opposing counsel (.2);
04/01/2020	Shira Gelfand	SZG	2.2	\$425.00	\$935.00	Correspondence with counsel (.3) correspondence with CEG (.2) begin research on Diane Greene, create bio for depo outline (1.7).

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
04/02/2020	Cara E. Greene	CEG	0.6	\$950.00	\$570.00	Meet and confer call with opposing counsel.
04/02/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Receipt & review of correspondence from CEG regarding meeting cancellation and draft response
04/02/2020	Shira Gelfand	SZG	4.3	\$425.00	\$1,827.50	Correspondence with CEG and MSJ re case management meeting (.2); continue drafting bio and objectives for Diane Greene (2.4) review relevant documents in order to draft bio (1.7).
04/06/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re case updates and weekly meeting.
04/06/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Update status of weekly meeting and confer with SZG and MSJ.
04/06/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review meeting agenda and draft correspondence to SZG.
04/06/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review agenda and prepare for team call.
04/06/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with CEG/SZG regarding case updates and next steps.
04/06/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to SZG regarding scheduling update.
04/06/2020	Shira Gelfand	SZG	0.8	\$425.00	\$340.00	Preparation for team meeting (.4); correspondence with MSJ (.2); correspondence with BXX (.2)
04/07/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Client status meeting (.4); follow up with K. Gage re discovery status (.1).
04/07/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference wit client/CEG/SZG regarding case updates and next steps.
04/07/2020	Shira Gelfand	SZG	1.1	\$425.00	\$467.50	Correspondence with opposing counsel (.1), preparation for call with client (.3); client call (.3); correspondence with MSJ (.2); correspondence with CEG (.2).
04/08/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Conference with SZG regarding deposition prep and discovery next steps.
04/08/2020	Shira Gelfand	SZG	3.1	\$425.00	\$1,317.50	Call with MSJ (.3); correspondence with opposing counsel (.2); begin drafting depo objectives and bio for Jennifer Burris, review relevant documents in Nuix (2.6).
04/09/2020	Shira Gelfand	SZG	1.7	\$425.00	\$722.50	Meeting with CEG (.5) review documents and continue drafting Jennifer Burdis depo objectives (1.2)
04/13/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re rescheduling weekly meeting.
04/13/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Reschedule weekly meeting.
04/13/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting with SZG and MXJ.
04/13/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to client regarding rescheduled call.
04/13/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Receipt & review of correspondence from client and draft response
04/13/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Conference with CEG/SZG regarding next steps and discovery strategy.
04/13/2020	Shira Gelfand	SZG	0.9	\$425.00	\$382.50	Prepare agenda for team call (.4); case management meeting (.2); correspondence with opposing counsel (.2); correspondence with client (.1).
04/14/2020	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence with MXJ re client communications.
04/14/2020	Shira Gelfand	SZG	0.4	\$425.00	\$170.00	Correspondence with client (.2); correspondence with MSJ (.2)
04/15/2020	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with opposing counsel.
04/16/2020	Cara E. Greene	CEG	1.0	\$950.00	\$950.00	Review letter from opposing counsel re discovery disputes and correspondence with client re same
04/16/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Receipt & review of correspondence from opposing counsel regarding responses to discovery letter
04/16/2020	Shira Gelfand	SZG	2.2	\$425.00	\$935.00	Correspondence with o/c (.2) Review opposing counsel letter, evaluate response and next steps (1.7); correspondence with client (.1); correspondence with MSJ and CEG (.2).
04/17/2020	Cara E. Greene	CEG	2.3	\$950.00	\$2,185.00	Conference with MXJ and SZG re discovery disputes and opposing counsel's letter (.4); video conference with client re same (.6); correspondence with client re organizational charts (.1); review discovery documents and disputed issues (1.2).
04/17/2020	Maya S. Jumper	MSJ	0.8	\$475.00	\$380.00	Review Defendant's response to discovery letter.
04/17/2020	Maya S. Jumper	MSJ	0.9	\$475.00	\$427.50	Conference call with MB/co-counsel / KD regarding filing and arbitration filing
04/17/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Receipt & review of correspondence from client regarding supervisory line
04/17/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Conference with CEG/SZG/client regarding.
04/17/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Debrief conference with SZG regarding assignment allocation.
04/17/2020	Shira Gelfand	SZG	2.1	\$425.00	\$892.50	Preparation for call with client (.7); case mgmt meeting with CEG and MSJ (.5); call with client (.5); email correspondence with client (.3); correspondence with opposing counsel (.1).
04/18/2020	Shira Gelfand	SZG	5.9	\$425.00	\$2,507.50	Correspondence with MSJ (.6); begin drafting letter to court, conduct research re same (5.3)
04/19/2020	Maya S. Jumper	MSJ	3.2	\$475.00	\$1,520.00	Conduct legal research and draft proposed agenda for discovery meet & confer
04/19/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review edits agenda from SZG.
04/19/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review letter to court regarding discovery disputes and revised schedule.
04/19/2020	Shira Gelfand	SZG	4.1	\$425.00	\$1,742.50	Continue drafting letter to judge, conduct research re same (2.7); review MSJ outline and agenda for meet and confer, add additional information (1.4).
04/20/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re pulling and compiling documents for review
04/20/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re pulling and compiling documents.
04/20/2020	Brian D. Kouassi	BDK	1.2	\$325.00	\$390.00	Compile list of documents requested by opposing counsel and draft email to database admins
04/20/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins re opposing counsel document requests.
04/20/2020	Cara E. Greene	CEG	2.2	\$950.00	\$2,090.00	Case management meeting with MXJ and SZG (.5); prepare for meet and confer meeting with opposing counsel (.7); meet and confer call with opposing counsel (1.0).
04/20/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with CEG/SZG regarding case updates and today's M&C.
04/20/2020	Maya S. Jumper	MSJ	1.5	\$475.00	\$712.50	Meet and confer with opposing counsel.
04/20/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Review SZG edits to M&C outline and revise and circulate to team.
04/20/2020	Maya S. Jumper	MSJ	1.2	\$475.00	\$570.00	Review file and legal authority in preparation for M&C.
04/20/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to CEG regarding discovery outline and discovery letters.
04/20/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to BK regarding document pull request.
04/20/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to BK regarding document assignment.
04/20/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding add'l case authority.
04/20/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference call with SZG regarding discovery letter.
04/20/2020	Maya S. Jumper	MSJ	0.8	\$475.00	\$380.00	Review correspondence from NXF and review samples regarding comparator discovery.
04/20/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Debrief conference with CEG/SZG regarding next steps and case strategy.
04/20/2020	Shira Gelfand	SZG	7.6	\$425.00	\$3,230.00	Case management meeting w CEG and MSJ (.6); research and preparation for meet and confer (2.7); meet and confer (1.1); call with MSJ and CEG (.4); call with MSJ (.2); edit and supplement letter to court (2.3) email to client (.1); email w opposing counsel re modified schedule (.2).
04/21/2020	Brian D. Kouassi	BDK	2.0	\$325.00	\$650.00	Organize opposing counsel's document request and pull requested documents from Ringtail
04/21/2020	Brian D. Kouassi	BDK	1.1	\$325.00	\$357.50	Compile and draft exhibits for Letter Motion to the SDNY.
04/21/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with ringtail admins re document production
04/21/2020	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Edit exhibits for upcoming letter to the court.
04/21/2020	Brian D. Kouassi	BDK	1.4	\$325.00	\$455.00	Organize and compile requested documents from opposing counsel in electronic binder format
04/21/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re exhibits and fix issues.
04/21/2020	Christopher C. Alter	CCA	0.7	\$325.00	\$227.50	Download native files for binder; correspondence with team re same.
04/21/2020	Cara E. Greene	CEG	2.7	\$950.00	\$2,565.00	Edit and revise pre-motion letter to court (1.9); telephone call with client re pre-motion letter (.5); review schedule and correspondence re same (.3).
04/21/2020	Maya S. Jumper	MSJ	2.3	\$475.00	\$1,092.50	Conduct legal research and revise letter motion regarding discovery.
04/21/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to BXS regarding filing.
04/21/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG to client.
04/21/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference call with SZG regarding discovery letter.
04/21/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Conduct legal research.
04/21/2020	Maya S. Jumper	MSJ	1.7	\$475.00	\$807.50	Revise and edit letter and circulate to CEG for final review.
04/21/2020	Maya S. Jumper	MSJ	2.6	\$475.00	\$1,235.00	Coordinate and monitor filing of discovery letter.

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
04/21/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Correspondence with team re creating text load file and download document from Nuix to file path
04/21/2020	Shira Gelfand	SZG	5.6	\$425.00	\$2,380.00	Email with client (.2); edit and supplement letter (.7); meeting with client (.4); correspondence with BKK (.3); review exhibits, make edits (.8); cite check and review letter (1.3); correspondence with CEG and MSJ (.6); correspondence with o/c (.3) finalize filing and send to paralegal (.8); review filing (.3).
04/22/2020	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Update case file database with recent docket entries as well as update case deadlines with new court dates.
04/22/2020	Christopher C. Alter	CCA	0.2	\$325.00	\$65.00	Correspondence with SZG re statistics on Defendant productions.
04/22/2020	Shira Gelfand	SZG	1.4	\$425.00	\$595.00	Review correspondence from judge (.3); correspondence with MSJ and CEG (.3); review of documents in Nuix to provide stats to CEG (.6); correspondence with o/c (.2).
04/23/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re document production.
04/23/2020	Brian D. Kouassi	BDK	2.7	\$325.00	\$877.50	Finalize document production to opposing counsel re discovery
04/23/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Phone conference with SXO re inside sales process.
04/23/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Review and edit correspondence to opposing counsel (.2); case management meeting (.3).
04/23/2020	Daniel Stromberg	DXS	0.7	\$875.00	\$612.50	Review opposing counsel email re: Redwood data export production format and email with counsel re: deficiencies
04/23/2020	Shira Gelfand	SZG	3.1	\$425.00	\$1,317.50	Preparation for team call (.4); case mgmt meeting with MSJ and CEG (.5); correspondence with opposing counsel re meet and confer and redwood files (.6); review letter re plaintiffs disc. deficiencies (.9) prepare information re Client search of work files (.5); correspondence w MSJ re outstanding projects and assignments (.2).
04/24/2020	Brian D. Kouassi	BDK	2.4	\$325.00	\$780.00	Compile Defendant's relevant documents from multiple productions and present to attorneys' for review
04/24/2020	Brian D. Kouassi	BDK	0.8	\$325.00	\$260.00	Combine documents in portfolio format for document production review
04/24/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re document production.
04/24/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re document production.
04/24/2020	Brian D. Kouassi	BDK	1.4	\$325.00	\$455.00	Compile all of Plaintiff's document productions for team's review
04/24/2020	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence with client re deficiency letter.
04/24/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review file and draft correspondence to client regarding discovery update
04/24/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review file and draft correspondence to client regarding deficiency letter
04/24/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Receipt & review of correspondence from client regarding deficiency letter
04/24/2020	Maya S. Jumper	MSJ	1.5	\$475.00	\$712.50	Review and analyze Defendant's deficiency letter.
04/24/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference call with SZG regarding Defendant's deficiency letter.
04/24/2020	Sara Olson	SXO	0.4	\$350.00	\$140.00	Circulate Defendant's hot documents to BDK for deposition binder.
04/24/2020	Shira Gelfand	SZG	2.4	\$425.00	\$1,020.00	Meeting with MSJ re outstanding tasks (.4); correspondence with BKK re document review (.3) preparation of agenda and review of documents for meet and confer (1.7).
04/25/2020	Shira Gelfand	SZG	2.9	\$425.00	\$1,232.50	Correspondence w opposing counsel (.3); continue research and prepare agenda for meet and confer (2.6)
04/27/2020	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Compile Attorney Client Privileged documents for discovery review.
04/27/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with CCA re document production.
04/27/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re document production.
04/27/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re document production.
04/27/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re document production.
04/27/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Phone conference with SXO re ACP documents.
04/27/2020	Christopher C. Alter	CCA	0.8	\$325.00	\$260.00	Pull attachments to referenced documents in Nuix; correspondence with team re same
04/27/2020	Cara E. Greene	CEG	2.8	\$950.00	\$2,660.00	Conference with SZG, MXJ re outstanding discovery (.5); prepare for meet and confer call (.6); meet and confer call with opposing counsel (1.0); review and edit joint letter to the court (.7).
04/27/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review Defendant's responses RFPs and draft correspondence production summary.
04/27/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Review and revise joint status letter.
04/27/2020	Maya S. Jumper	MSJ	1.5	\$475.00	\$712.50	Attend meet and confer on outstanding discovery issues.
04/27/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Prepare for M&C.
04/27/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to SZG regarding agenda.
04/27/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to SO regarding privilege log.
04/27/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to BK regarding NOAs.
04/27/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from opposing counsel regarding email search protocol
04/27/2020	Sara Olson	SXO	0.3	\$350.00	\$105.00	Run a report and create a client document privilege log on Nuix and circulate to SZG and MSJ
04/27/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Correspondence with SZG re batch coding for attorney client privilege in Nuix
04/27/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Correspondence with SZG re running a report for attorney client privileged documents on Nuix
04/27/2020	Shira Gelfand	SZG	7.4	\$425.00	\$3,145.00	Finalize notes for meet and confer (.6); prepare agenda for case management meeting (.3); case mgmt meeting with CEG and MSJ (.5); call with client (.2); preparation for m/c (.7); correspondence with Ringtail admins re privilege log (.4); prepare and send m/c documents to CEG (.2); meet and confer with Google (.9); review RFP responses and draft letter re additional production (.7); correspondence w o/c (.2); review defendants draft of joint status letter, edit and supplement, correspondence with CEG and MSJ re same (1.4); supplement and finalize letter, send two rounds of edits to o/c (1.2).
04/28/2020	Brian D. Kouassi	BDK	1.3	\$325.00	\$422.50	Save all recently filed documents and file Appearance of Counsel in the SDNY for MSJ
04/28/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondence with the New York State Bar to obtain log-in information for SZG
04/28/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re account information for the SDNY
04/28/2020	Brian D. Kouassi	BDK	1.2	\$325.00	\$390.00	Download Defendant's Production to case database.
04/28/2020	Christopher C. Alter	CCA	1.1	\$325.00	\$357.50	Import Defendant productions to Nuix; correspondence with team re same.
04/28/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Video conference with SZG, MXJ and client to discuss discovery status.
04/28/2020	Daniel Stromberg	DXS	0.2	\$875.00	\$175.00	Advise SXG re: client LinkedIn and Twitter content export options.
04/28/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from BK regarding NOA filing.
04/28/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Monitor NOA filing.
04/28/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG regarding agenda to client.
04/28/2020	Shira Gelfand	SZG	4.1	\$425.00	\$1,742.50	Review defendant's letter and joint letter (1.3); prepare agenda for client call (.6); correspondence w paralegals re document upload into Ringtail (.4); correspondence re filing NOA (.2); call with client (.5); prepare follow up email re outstanding discovery items and review of documents for words of support (.8); correspondence w DXS re social media posts (.3).
04/29/2020	Brian D. Kouassi	BDK	0.6	\$325.00	\$195.00	File Notice of Appearance in the SDNY for SZG.
04/29/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re filing Notice of Appearance in the SDNY
04/29/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with CA re document production.
04/29/2020	Christopher C. Alter	CCA	1.4	\$325.00	\$455.00	Import Defendant productions; correspondence with team re same.
04/29/2020	Shira Gelfand	SZG	6.6	\$425.00	\$2,805.00	Attention to filing NOA (.3); document review of new Google production (2.8); edit comparator document w new information (.6); evaluate Google's ESI search, compare to ours and determine deficiencies (2.7); correspondence w MSJ (.2).
04/30/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondence with MSJ re upcoming tasks.
04/30/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with O&G paralegals re help with tasks.
04/30/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with VXY re help with privilege log.
04/30/2020	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Compile documents for upcoming production.
04/30/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Review and save in case database Judge Schofield's recent Order.
04/30/2020	Brian D. Kouassi	BDK	2.1	\$325.00	\$682.50	Compile Defendant's Production in PDF format for CEG's review.
04/30/2020	Christopher C. Alter	CCA	0.1	\$325.00	\$32.50	Correspondence with BKK re defendant production.
04/30/2020	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Case management meeting with SZG, MXJ.

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
04/30/2020	Daniel Stromberg	DXS	0.5	\$875.00	\$437.50	Review SXG memo re: defendant search term proposal, advise re: strategy and next steps.
04/30/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review search term comparison.
04/30/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Draft correspondence to BK regarding doc production follow up
04/30/2020	Maya S. Jumper	MSJ	2.0	\$475.00	\$950.00	Review deficiency letter and production of documents.
04/30/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review correspondence to BK and VXY regarding privilege log.
04/30/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to BK regarding document production assignment.
04/30/2020	Shira Gelfand	SZG	3.6	\$425.00	\$1,530.00	Correspondence with DXS re ESI Search term compare (.6); Prepare agenda for case management meeting (.4); Case management meeting with CEG and MSJ (.4); Call with MSJ (.3); Review court order re discovery conference. correspondence with BXX re same (.4); Correspondence with client (.1); Continue review of new production, note for AEO documents (1.4).
04/30/2020	Vincent Yang	VXY	2.7	\$325.00	\$877.50	Create privilege log re attorney-client privileged documents.
05/01/2020	Brian D. Kouassi	BDK	2.0	\$325.00	\$650.00	Deal with all of the technical problems with defendant's production from ringtail and compile documents that are needed.
05/01/2020	Christopher C. Alter	CCA	0.7	\$325.00	\$227.50	Combine PDF of Defendant production for attorney review; correspondence with BXX re same
05/01/2020	Maya S. Jumper	MSJ	3.3	\$475.00	\$1,567.50	Conduct legal research regarding AEO and relevancy redactions and draft arg regarding same
05/01/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review 4/28 production for AEO designation.
05/01/2020	Maya S. Jumper	MSJ	3.0	\$475.00	\$1,425.00	Review file and revise privilege log.
05/01/2020	Shira Gelfand	SZG	0.7	\$425.00	\$297.50	Draft letter to Defendants (.7);.
05/03/2020	Shira Gelfand	SZG	0.4	\$425.00	\$170.00	Correspondence re outstanding issues for production.
05/04/2020	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Draft and send correspondence to client re documents.
05/04/2020	Cara E. Greene	CEG	0.9	\$950.00	\$855.00	Edit meet and confer letter re outstanding discovery (.4); case management meeting with SZG, MSJ (.5).
05/04/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference call with SZG/CEG.
05/04/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review and revise correspondence from SZG to opposing counsel.
05/04/2020	Shira Gelfand	SZG	3.2	\$425.00	\$1,360.00	Prepare agenda for case management meeting (.4); Case management meeting with CEG and MSJ (.4); Correspondence with client (.4); Correspondence with BXX re social media archive download (.2); Prepare and send agenda to CEG, MSJ, and client for client call (.3); Continue compare and supplement ESI Search protocol (1.2); Edit and supplement email, send to opposing counsel (.3).
05/05/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Download production from client and send to CCA for upload to case database
05/05/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with CCA re uploading client production
05/05/2020	Christopher C. Alter	CCA	2.2	\$325.00	\$715.00	Ingest client documents to Nuix; correspondence with team re same.
05/05/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Video conference with client re discovery and strategy.
05/05/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Review D.'s interrogatories and draft correspondence to CEG/SZG regarding same.
05/05/2020	Maya S. Jumper	MSJ	1.4	\$475.00	\$665.00	Update redaction log and review production.
05/05/2020	Maya S. Jumper	MSJ	1.2	\$475.00	\$570.00	Conduct legal research.
05/05/2020	Shira Gelfand	SZG	2.3	\$425.00	\$977.50	Call with client (.5); continue preparing ESI search compare (1.3); correspondence with RT admins re twitter archive (.3); correspondence with MSJ (.2).
05/06/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re downloading client documents.
05/06/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Download production from client.
05/06/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re production from client.
05/06/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail re uploading documents.
05/06/2020	Christopher C. Alter	CCA	0.2	\$325.00	\$65.00	Review social media client eDiscovery export; correspondence with SZG re same.
05/06/2020	Christopher C. Alter	CCA	0.1	\$325.00	\$32.50	Correspondence with SZG re collecting client social media discovery.
05/06/2020	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Discovery review and production.
05/06/2020	Shira Gelfand	SZG	2.8	\$425.00	\$1,190.00	Correspondence with client (.1); Review client's responsive tweets, prepare for production (2.3); correspondence with MSJ and CEG re tweets (.1); Correspondence with ringtail admins (.2); correspondence with opposing counsel (.1).
05/07/2020	Brian D. Kouassi	BDK	0.6	\$325.00	\$195.00	Compile client documents and send to upload for production
05/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re compiling client documents to upload documents
05/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with CCA re uploading client production
05/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with CCA re uploading client production
05/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with CCA re uploading client production
05/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with CCA re uploading client production
05/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with CCA re upcoming discovery production.
05/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Pull recent docket entry and upload in system.
05/07/2020	Christopher C. Alter	CCA	1.9	\$325.00	\$617.50	Ingest client documents to Nuix; correspondence with team re same.
05/07/2020	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Case management meeting with MSJ, SZG.
05/07/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with CEG/SZG.
05/07/2020	Maya S. Jumper	MSJ	1.8	\$475.00	\$855.00	Review joint letter.
05/07/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Draft correspondence to opposing counsel regarding joint letter and discovery response
05/07/2020	Shira Gelfand	SZG	4.9	\$425.00	\$2,082.50	Correspondence with opposing counsel (.4); Review joint letter to be filed (.2); Review of client LinkedIn posts, correspondence with RT admins re same (1.4); Correspondence with BXX (.2); Prepare agenda for case management meeting (.6); Case management meeting with CEG and MSJ (.5); Begin drafting cover letter for production (.8); Correspondence with client (.2); Call with MSJ re words of support redactions (.3).
05/08/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re Discovery Conference.
05/08/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Update case deadlines with new dates and send to team.
05/08/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re emails missing attachments.
05/08/2020	Brian D. Kouassi	BDK	2.0	\$325.00	\$650.00	Preparation of documents for discovery production and upcoming filing to the court
05/08/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with CCA re upcoming production and documents on Ringtail
05/08/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with CCA re upcoming production and documents on Ringtail
05/08/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with CCA re upcoming production and documents on Ringtail
05/08/2020	Christopher C. Alter	CCA	1.1	\$325.00	\$357.50	Ingest client documents in Nuix; correspondence with team re same.
05/08/2020	Christopher C. Alter	CCA	0.6	\$325.00	\$195.00	Research and code documents in Nuix re upcoming production; correspondence with team re same
05/08/2020	Christopher C. Alter	CCA	0.3	\$325.00	\$97.50	Review previous documents produced re updates; correspondence with BXX re same.
05/08/2020	Cara E. Greene	CEG	1.1	\$950.00	\$1,045.00	Correspondence with opposing counsel re outstanding discovery (.5); review documents in advance of court conference (.6).
05/08/2020	Daniel Stromberg	DXS	0.2	\$875.00	\$175.00	Email defendant re: production format deficiencies re: redwood data export
05/08/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Draft correspondence to BXX regarding production task
05/08/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Review file and draft correspondence to BXX regarding pl.'s production and case pull assignment
05/08/2020	Maya S. Jumper	MSJ	2.6	\$475.00	\$1,235.00	Draft discovery conference letter annotation.
05/08/2020	Shira Gelfand	SZG	3.9	\$425.00	\$1,657.50	Correspondence with DXS re Redwood files (.2); Edit and supplement ESI Section of annotated letter (1.6); Edit and supplement production cover letter (.8); Review of documents in ringtail in advance of Monday production (.6); Correspondence with opposing counsel (.2); Correspondence with CEG (.1); Correspondence with BXX and Ringtail team re unredacted documents (.3); correspondence with client (.1).
05/11/2020	Brian D. Kouassi	BDK	1.4	\$325.00	\$455.00	Pull and compile list of cases cited in Plaintiff's Letter Motion and Defendant's Response to Letter Motion
05/11/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re cited cases.
05/11/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re upcoming production.

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
05/11/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ, SZG, and CCA re upcoming production
05/11/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG and MSJ re cited cases.
05/11/2020	Brian D. Kouassi	BDK	1.1	\$325.00	\$357.50	Draft cover letter containing document production information to defendant's counsel
05/11/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re prepping documents for Discovery conference.
05/11/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Compile documents for upcoming Discovery Conference.
05/11/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re discovery conference.
05/11/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Compile and prep documents for tomorrow's production
05/11/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with CCA, MSJ, and SZG re document production
05/11/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with CCA, MSJ, and SZG re document production
05/11/2020	Christopher C. Alter	CCA	0.6	\$325.00	\$195.00	Prepare plaintiff productions in Nuix; correspondence with team re same
05/11/2020	Christopher C. Alter	CCA	0.2	\$325.00	\$65.00	Correspondence with team re upcoming productions.
05/11/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting with MJZ, SZG.
05/11/2020	Daniel Stromberg	DXS	0.3	\$875.00	\$262.50	Review opposing counsel email re: redwood data export production format, reply re: deficiencies
05/11/2020	Maya S. Jumper	MSJ	1.7	\$475.00	\$807.50	Review file, conduct legal research and draft annotated letter to court
05/11/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with CEG/SZG regarding case updates and next steps.
05/11/2020	Maya S. Jumper	MSJ	1.3	\$475.00	\$617.50	Draft correspondence to opposing counsel regarding outstanding discovery issues.
05/11/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from client and draft correspondence to BXK regarding redactions
05/11/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review and analyze Defendant's letter to the court regarding comparator time periods.
05/11/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Draft call script.
05/11/2020	Shira Gelfand	SZG	3.8	\$425.00	\$1,615.00	Prepare agenda for case management meeting (.4); Case management meeting (.5); Review of documents in Nuix for production (.8); Correspondence with RT admins and BXK re prep for production (.4); Correspondence with opposing counsel re Redwood files (.2); Call and email with client (.2); Correspondence with BXK re virtual binder for discovery conference (.2); prepare agenda for client call, send to CEG, MSJ, and Ulku (.4); Review ECF letter from Google (.7).
05/12/2020	Brian D. Kouassi	BDK	1.1	\$325.00	\$357.50	Compile all of the attorney client privileged documents.
05/12/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re attorney client privileged documents.
05/12/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Pull recent docket filings and update our database.
05/12/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with CCA re Plaintiff's discovery production.
05/12/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with CCA re Plaintiff's discovery production.
05/12/2020	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Final preparation of discovery production to Defendant's
05/12/2020	Brian D. Kouassi	BDK	0.8	\$325.00	\$260.00	Attend to issues re production and send finalize production to Defendant's
05/12/2020	Christopher C. Alter	CCA	2.3	\$325.00	\$747.50	Prepare plaintiff productions in Nuix; correspondence with team re same
05/12/2020	Cara E. Greene	CEG	0.8	\$950.00	\$760.00	Review and edit privilege log, review and edit correspondence to opposing counsel
05/12/2020	Maya S. Jumper	MSJ	1.5	\$475.00	\$712.50	Review and revise privilege log.
05/12/2020	Maya S. Jumper	MSJ	2.8	\$475.00	\$1,330.00	Conduct legal research and draft response ltr to court.
05/12/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review doc production and draft correspondence to BXK/CCA regarding redactions
05/12/2020	Shira Gelfand	SZG	3.0	\$425.00	\$1,275.00	Call with client (.6); Correspondence with MSJ (.1); Review court filing (.2); Correspondence with CEG re response letter (.2); Email with client (.2); Review production, attention to finalizing, redactions, correspondence with BXK and RT Admins and send to opposing counsel (1.7).
05/13/2020	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Download recent discovery from Defendant.
05/13/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re downloading discovery production from Defendant's counsel
05/13/2020	Christopher C. Alter	CCA	1.6	\$325.00	\$520.00	Import Defendant production to Nuix; correspondence with team re same.
05/13/2020	Maya S. Jumper	MSJ	1.3	\$475.00	\$617.50	Review cited cases in prep for discovery conference.
05/13/2020	Shira Gelfand	SZG	3.9	\$425.00	\$1,657.50	Correspondence with BXK re new production (.2); Review letters and filing and prep for discovery conference (1.7); Cite check, finalize editing response letter, send to BXK for ECF (1.8); Correspondence with MSJ and CEG re outstanding tasks (.2).
05/14/2020	Cara E. Greene	CEG	3.1	\$950.00	\$2,945.00	Prepare for court discovery conference (2.0); telephone call with SZG, MSJ re same (.2); court conference (.7); telephone call with SZG, MSJ post-conference (.2).
05/14/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to BK regarding revision to redaction log
05/14/2020	Maya S. Jumper	MSJ	1.8	\$475.00	\$855.00	Attend discovery conference.
05/14/2020	Maya S. Jumper	MSJ	1.2	\$475.00	\$570.00	Prepare for discovery conference.
05/14/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Conference with SZG/CEG regarding debrief from conf.
05/14/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to lit support regarding transcript order
05/14/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Receipt & review of correspondence from SZG regarding update to client
05/14/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Draft correspondence to CXT regarding fee app review.
05/14/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review court order.
05/14/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Revise annotated discovery letter.
05/14/2020	Shira Gelfand	SZG	4.5	\$425.00	\$1,912.50	Correspondence with opposing counsel re production (.3) Prep for discovery conference w. Judge Schofield (1.8); attend discovery conference (.8); case management meeting with CEG and MSJ (.2); Call with MSJ (.2); Draft email to client (.6); review order from judge (.2); Correspondence with opposing counsel re ESI (.2); Correspondence with paralegals re ordering transcript from hearing (.2).
05/15/2020	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Update redaction log re Plaintiff's production to the Defendant's
05/15/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Revise priv and redaction log with new redactions from 5/12 production
05/15/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Revise privilege log and circulate to CEG/SZG with updated redactions.
05/15/2020	Shira Gelfand	SZG	2.2	\$425.00	\$935.00	Draft email to opposing counsel (.4); Review ESI search terms (.7); Review of new production in Nuix (.9); correspondence with MSJ and CEG (.2);.
05/18/2020	Brian D. Kouassi	BDK	3.1	\$325.00	\$1,007.50	Download large document production from Defendant's.
05/18/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re downloading production from Defendant's
05/18/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins, SZG, and MSJ re Defendant's recent discovery production
05/18/2020	Christopher C. Alter	CCA	1.5	\$325.00	\$487.50	Import Defendant productions to Nuix; correspondence with team re same.
05/18/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting with SZG, MSJ.
05/18/2020	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Edit correspondence to opposing counsel.
05/18/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with CEG/SZG regarding case updates and next steps.
05/18/2020	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Review file and draft correspondence to opposing counsel regarding improper redactions
05/18/2020	Shira Gelfand	SZG	4.3	\$425.00	\$1,827.50	Review correspondence from opposing counsel re ESI Search (.4) Draft agenda for team meeting, send to CEG and MSJ (.4); case management meeting (.5); Call with MSJ (.2); Draft response to o/c email, review documents (1.3); Review Google privilege log (.6); Correspondence with RT admins re Google production (.3); Correspondence with client (.2); Prepare agenda for client call (.4).
05/19/2020	Christopher C. Alter	CCA	1.8	\$325.00	\$585.00	Import Defendant production to Nuix; correspondence with team re same.
05/19/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Telephone call with client.
05/19/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with CEG/SZG/client regarding case updates.
05/19/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to CEG regarding follow up on privilege log
05/19/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review file and prepare for M&C.
05/19/2020	Shira Gelfand	SZG	1.0	\$425.00	\$425.00	Call with client (.5); Correspondence with MSJ (.2); Correspondence with opposing counsel (.1); Correspondence with Ringtail admins re new Google production (.2).
05/20/2020	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence with MSJ re ESI searches and redactions (.1); correspondence with opposing counsel re same (.1)

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
05/20/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Draft agenda for discovery M&C.
05/20/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Draft correspondence to CEG regarding preparation for M&C.
05/20/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to CEG regarding response to opposing counsel.
05/20/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Revise and circulate draft stipulation to CEG/SZG.
05/20/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from SZG regarding edits to M&C agenda.
05/20/2020	Shira Gelfand	SZG	2.1	\$425.00	\$892.50	Correspondence with opposing counsel (.4); review of MSJ agenda for meet and confer, edit and supplement, review documents re same (1.6); correspondence with client (.1);.
05/21/2020	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence with opposing counsel.
05/21/2020	Daniel Stromberg	DXS	0.1	\$875.00	\$87.50	Advise SXG re: functionality to report search terms re: defendant hit report
05/21/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Draft correspondence to opposing counsel regarding search terms.
05/21/2020	Maya S. Jumper	MSJ	2.3	\$475.00	\$1,092.50	Review and revise ESI proposal.
05/21/2020	Shira Gelfand	SZG	5.8	\$425.00	\$2,465.00	Correspondence with MSJ and CEG re ESI Search (.3); Correspondence with DXS re ESI Search (.2); Correspondence with opposing counsel (.2); Correspondence with client (.1); Doc review of recent production (4.7); Correspondence with BXK (.2); Review of discovery conference transcript (.3).
05/22/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re saving documents to case database.
05/22/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re rescheduling weekly meeting.
05/22/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Update case files with new documents.
05/22/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Update case schedule and send to SZG and MSJ.
05/22/2020	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Case management meeting with MSJ, SZG.
05/22/2020	Daniel Stromberg	DXS	0.1	\$875.00	\$87.50	Advise MSJ re: search term reporting capabilities via custodian re: defendant ESI search
05/22/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with CEG/SZG regarding case updates and next steps.
05/22/2020	Maya S. Jumper	MSJ	1.0	\$475.00	\$475.00	Attend M&C with CEG/SZG and opposing counsel regarding discovery issues.
05/22/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to DXS regarding search term negotiation.
05/22/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review file, draft correspondence to opposing counsel regarding search terms and discovery requests
05/22/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Review and revise ESI search term proposal.
05/22/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review and revise correspondence from SZG to opposing counsel regarding search terms
05/22/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review and revise search term proposal.
05/22/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Draft correspondence to SZG/CEG regarding search term proposal and letter to opposing counsel
05/22/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to BK/SZG regarding scheduling.
05/22/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from CEG regarding conference.
05/22/2020	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Revise and finalize ESI search terms.
05/22/2020	Shira Gelfand	SZG	6.9	\$425.00	\$2,932.50	Review correspondence with opposing counsel (.4); Draft response to Paul Hastings, review documents re L10 roles (.6); Call with MSJ and CEG (.2); Prep for meet and confer (1.4); meet and confer (1.1); Call with MSJ (.6); Call with MSJ and CEG re m/c (.2); edit and supplement search terms, draft letter to Google re search terms (2.3).
05/26/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG and MSJ re rescheduling weekly meeting.
05/26/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re rescheduling meeting.
05/26/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Re-schedule meeting and send out new time to team.
05/26/2020	Cara E. Greene	CEG	1.0	\$950.00	\$950.00	Review new ESI search terms and edit same (.3); telephone call with client (.5); review and edit correspondence with opposing counsel (.2).
05/26/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to CEG/SZG regarding f/u with opposing counsel regarding discovery M&C
05/26/2020	Shira Gelfand	SZG	2.1	\$425.00	\$892.50	Draft and send letter to opposing counsel re ESI search, edit terms (.8); Correspondence with opposing counsel re comparator data (.4); Prepare agenda for client call (.2); Call with client (.5); Correspondence with MSJ (.2);.
05/27/2020	Cara E. Greene	CEG	0.7	\$950.00	\$665.00	Review ESI search terms and correspondence re same; correspondence with MSJ re discovery disputes.
05/27/2020	Maya S. Jumper	MSJ	0.8	\$475.00	\$380.00	Revise search terms and draft correspondence to CEG regarding discovery response to opposing counsel
05/27/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Revise proposed scheduling order.
05/27/2020	Maya S. Jumper	MSJ	0.9	\$475.00	\$427.50	Draft joint status letter.
05/27/2020	Shira Gelfand	SZG	2.5	\$425.00	\$1,062.50	Correspondence with opposing counsel (.8); Correspondence with MSJ (.2); Edit and supplement ESI search terms (.7); Correspondence with MSJ and CEG (.2); prepare slide for town hall (.6).
05/28/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re upcoming filing of Joint Letter.
05/28/2020	Brian D. Kouassi	BDK	0.7	\$325.00	\$227.50	Add edits to the Proposed Case Management Plan and Scheduling Order.
05/28/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondence with MSJ and SZG re upcoming filing of Joint Letter status to the SDNY
05/28/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with BXS, MSJ, and SZG re upcoming filing of Joint Status Letter to the SDNY
05/28/2020	Cara E. Greene	CEG	2.3	\$950.00	\$2,185.00	Review and edit correspondence to opposing counsel (.1); correspondence with MSJ re ESI searches (.1); review and edit stipulation (.2); case management meeting with MSJ, SZG (.5); review and edit joint letter to the court (.7); telephone calls with SZG re joint letter (.5); review Defendant's letter portions (.3).
05/28/2020	Daniel Stromberg	DXS	0.2	\$875.00	\$175.00	Review correspondence re: ESI custodian and search term results and advise MSJ re: custodian selection strategy
05/28/2020	Maya S. Jumper	MSJ	2.7	\$475.00	\$1,282.50	Review and revise joint status report.
05/28/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with CEG/SZG regarding case update and next steps.
05/28/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to DXS regarding search term M&C.
05/28/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence to SZG/CEG regarding edits to correspondence to opposing counsel
05/28/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Draft correspondence to opposing counsel regarding search terms.
05/28/2020	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Revise and circulate draft status report to CEG.
05/28/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review file and draft correspondence to CEG regarding court filing rules
05/28/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from opposing counsel regarding comparator list
05/28/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to opposing counsel regarding comparator list.
05/28/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to CEG regarding outreach to client regarding comparators
05/28/2020	Maya S. Jumper	MSJ	1.2	\$475.00	\$570.00	Draft scheduling order.
05/28/2020	Maya S. Jumper	MSJ	0.7	\$475.00	\$332.50	Review and revise proposed case management order.
05/28/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Proof and circulate final joint status letter to opposing counsel
05/28/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to BXS regarding filing status.
05/28/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to SZG regarding revisions to proposed case management schedule.
05/28/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Revise section of joint status letter.
05/28/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Draft correspondence to BXS regarding exhibit prep and filing
05/28/2020	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Monitor filing of joint status report.
05/28/2020	Shira Gelfand	SZG	8.3	\$425.00	\$3,527.50	Prepare agenda for team meeting (.4); Case management meeting (.3); Draft comparator section of joint letter (1.3); Draft redaction log section of letter, conduct research re same (1.1); Correspondence with DXS re redaction caselaw (.2); Draft and edit case mgmt plan, update to clean version (.9) Correspondence with opposing counsel (.4); Review Google docs re L8-9 employees (.6); Correspondence with counsel, CEG, and MSJ re case management plan, edit and supplement joint letter, prepare for ECF filing (3.1).
05/29/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re downloading recent discovery from opposing counsel
05/29/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re rescheduling weekly meeting.
05/29/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG and MSJ re recent discovery.
05/29/2020	Brian D. Kouassi	BDK	0.6	\$325.00	\$195.00	Download production from the Defendant's.
05/29/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins re uploading Defendant's production
05/29/2020	Christopher C. Alter	CCA	1.0	\$325.00	\$325.00	Import Defendant productions to Nuix; correspondence with team re same.

Rowe v. Google LLC
Case No. 19-cv-08655 (JHR)
Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
05/29/2020	Shira Gelfand	SZG	0.6	\$425.00	\$255.00	Review filed joint letter (.3); Correspondence with opposing counsel (.1); Attention to new production from defendant (.2);.
06/01/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Download recent documents filed within the SDNY and save into case database.
06/01/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Review court order and correspondence re same (.2); case management meeting with SZG, MSJ (.3).
06/01/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Conference with CEG/SZG regarding case updates and next steps.
06/01/2020	Maya S. Jumper	MSJ	1.9	\$475.00	\$902.50	Review motion to stay; conduct legal research.
06/01/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review notes from conference call with CEG/SZG.
06/01/2020	Shira Gelfand	SZG	3.9	\$425.00	\$1,657.50	Prepare agenda for team call (.4); Case management meeting with CEG and MSJ (.6); Call with MSJ (.2); Prepare and send agenda for client call (.4); Review defendant's ESI edits and redline, review docs re same, send memo to MSJ (.2.3).
06/02/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Save documents recently filed in the Court.
06/02/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Telephone call with client re case status and strategy.
06/02/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference call with client regarding discovery update and court order
06/03/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re recent updates with case.
06/03/2020	Shira Gelfand	SZG	1.8	\$425.00	\$765.00	Call with MSJ (.2); Correspondence with o/c (.1); Correspondence w/ BKK re production (.1) doc review (1.4)
06/04/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re downloading Defendant's production.
06/04/2020	Brian D. Kouassi	BDK	0.8	\$325.00	\$260.00	Download Defendant's production.
06/04/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail re uploading Defendant's production
06/04/2020	Brian D. Kouassi	BDK	1.2	\$325.00	\$390.00	Update case timeline with Court approved dates in the Second Amended Civil Case Management Plan.
06/04/2020	Christopher C. Alter	CCA	1.4	\$325.00	\$455.00	Import Defendant production to nuix; correspondence with team re same
06/04/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting with SZG and MSJ.
06/04/2020	Maya S. Jumper	MSJ	0.8	\$475.00	\$380.00	Review file and draft ESI search term proposal to CEG.
06/04/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Proof and finalize stipulation regarding redactions of words of support
06/04/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG to opposing counsel regarding ESI search terms and M&C proposal
06/04/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review and revise ESI proposal.
06/04/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence in response to SZG regarding ESI search term proposal.
06/04/2020	Maya S. Jumper	MSJ	0.8	\$475.00	\$380.00	Draft correspondence to CEG/SZG and opposing counsel regarding revised ESI proposal
06/04/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG regarding summary of production.
06/04/2020	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Review file and correspondence to opposing counsel regarding ESI proposal
06/04/2020	Shira Gelfand	SZG	5.7	\$425.00	\$2,422.50	Prepare agenda for team call (.3); case management meeting with CEG and MSJ (.5); Doc review (3.3); Draft email and prepare revised ESI Search, send to o/c (1.2); Correspondence with CEG and MSJ re Google's new production and pull RT docs (.4).
06/05/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins re defendant's production.
06/05/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review opposing counsel edits to ESI proposal; draft correspondence to CEG/SZG regarding same
06/05/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to opposing counsel regarding ESI search term proposal edits and M&C scheduling
06/05/2020	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Draft agenda and prepare for M&C.
06/05/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Review M&C notes and draft summary to CEG/SZG.
06/05/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review Google's comparator L8-L9 snapshot.
06/05/2020	Maya S. Jumper	MSJ	1.2	\$475.00	\$570.00	Lead M&C on ESI, scheduling and outstanding discovery issues.
06/05/2020	Shira Gelfand	SZG	1.8	\$425.00	\$765.00	Call with MSJ (.2); Call with opposing counsel (.5); Review correspondence from MSJ re call (.4); Correspondence with opposing counsel re L8-9 positions and review (.7).
06/08/2020	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Case management meeting with SZG, MSJ.
06/08/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Conference call CEG/SZG regarding case updates and M&C recap.
06/08/2020	Maya S. Jumper	MSJ	0.7	\$475.00	\$332.50	Review correspondence from CEG regarding conflict check; conduct conflict check
06/08/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG and respond regarding scheduling.
06/08/2020	Shira Gelfand	SZG	2.0	\$425.00	\$850.00	Send agenda to team (.2); Case management meeting with CEG and MSJ (.7); Review documents for ESI search dates (.8); Draft and send agenda to client for call (.3).
06/09/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review document production.
06/09/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from opposing counsel and draft correspondence regarding revised ESI proposal and Defendant's production.
06/09/2020	Shira Gelfand	SZG	1.5	\$425.00	\$637.50	Correspondence with MSJ (.2); Correspondence with opposing counsel (.2); Correspondence with DXS re ESI search (.3); Review Nuix for Breslow documents (.8).
06/10/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Review and edit ESI search proposal, edit letter to opposing counsel.
06/10/2020	Daniel Stromberg	DXS	0.3	\$875.00	\$262.50	Propose esi search term modification to exclude signature block hits per SZG.
06/10/2020	Maya S. Jumper	MSJ	1.9	\$475.00	\$902.50	Review file and revise search term proposal and draft correspondence regarding same to opposing counsel
06/10/2020	Maya S. Jumper	MSJ	1.6	\$475.00	\$760.00	Finalize and circulate correspondence to opposing counsel regarding ESI
06/10/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference call with SXG regarding 30(b)(6) depo.
06/10/2020	Shira Gelfand	SZG	4.7	\$425.00	\$1,997.50	Correspondence with MSJ re ESI search (.4); Review docs and search for relevant dates and limiters in search term proposal (1.2); Edit and supplement ESI search terms (1.3); Correspondence with opposing counsel (.2); Call with CEG (.1); Call with MSJ (.3); Review defendant's objections to 30(b)(6) depo topics, review current notice of deposition (1.2);.
06/11/2020	Christopher C. Alter	CCA	0.2	\$325.00	\$65.00	Review previous production re document count; correspondence with team re same
06/11/2020	Cara E. Greene	CEG	1.0	\$950.00	\$950.00	Telephone call with client re case status (.5); case management meeting with SZG, MSJ (.5).
06/11/2020	Maya S. Jumper	MSJ	1.0	\$475.00	\$475.00	Conference with CEG/SZG regarding case updates and next steps.
06/11/2020	Shira Gelfand	SZG	1.4	\$425.00	\$595.00	Correspondence with client (.2); Proofread, cite check, and edit of mediation statement (1.2)
06/11/2020	Shira Gelfand	SZG	2.4	\$425.00	\$1,020.00	Prep for client call (.2); Client call (.6); attention to Nuix docs to compare with client's work label (.7); Prepare agenda for team call (.4); team call (.5).
06/12/2020	Shira Gelfand	SZG	1.6	\$425.00	\$680.00	Correspondence with opposing counsel (.4); Review L10 comparator document and compare to documents in Nuix (.8); Correspondence with MSJ (.2); Correspondence with client (.2).
06/15/2020	Shira Gelfand	SZG	6.2	\$425.00	\$2,635.00	Prepare agenda for team meeting (.3); Correspondence with MSJ (.2); Draft letter to opposing counsel, review court order and documents re same (1.3); case management meeting (.5); Prepare documents for 30(b)(6) topics 1-2 (3.3); correspondence with client (.2); Correspondence with opposing counsel (.4).
06/16/2020	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Telephone call with client.
06/16/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Conference with SZG and client regarding next steps and discovery updates.
06/16/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Debrief with SZG regarding next steps.
06/16/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review and revise 30b6 notice.
06/16/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review and revise proposed correspondence to opposing counsel regarding discovery disputes and 30b notice
06/16/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to client regarding KYR webinar.
06/16/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to BK regarding comparator data review.
06/16/2020	Shira Gelfand	SZG	5.3	\$425.00	\$2,252.50	Prepare for client call (.2); Client call (.2); Call with MSJ (.1); Edit and supplement 30(b)(6) deposition notice (.8); Prepare draft letter to opposing counsel (.7); Review documents for gHire info (1.2); Correspondence with client (.3); attention to MSJ edits, edit response to o/c (.6); Review docs for 30(b)(6) deposition (1.2).
06/17/2020	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Conference with SZG re ESI search terms, correspondence re same.
06/17/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review revised 30(b)6 notice and correspondence to opposing counsel
06/17/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with SZG/CEG regarding discovery issues.
06/17/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Schedule prep call regarding M&C.

Rowe v. Google LLC
Case No. 19-cv-08655 (JHR)
Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
06/17/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to SZG regarding correspondence to opposing counsel
06/17/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review and revise draft correspondence to opposing counsel regarding comparators
06/17/2020	Maya S. Jumper	MSJ	0.7	\$475.00	\$332.50	Review correspondence from opposing counsel/CEG and draft correspondence regarding client outreach and M&C recap.
06/17/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to CEG regarding follow up on discovery disputes from M&C
06/17/2020	Maya S. Jumper	MSJ	1.2	\$475.00	\$570.00	Lead M&C on outstanding discovery disputes.
06/17/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with SZH regarding prep for M&C.
06/17/2020	Shira Gelfand	SZG	3.4	\$425.00	\$1,445.00	Correspondence with MSJ and CEG re letter to opposing counsel (.4); edit and supplement 30(b)(6) deposition notice (.8); Correspondence with opposing counsel (.2); meet and confer (.5); Correspondence with client (.4); Correspondence with MSJ (.3); Correspondence with opposing counsel re production (.1); Review documents to send gHire docs to client (.7).
06/18/2020	Christopher C. Alter	CCA	1.0	\$325.00	\$325.00	Import Defendant productions to Nuix; correspondence with team re same.
06/18/2020	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Case management meeting with SZG, MSJ (.3); review and edit correspondence with opposing counsel (.1).
06/18/2020	Maya S. Jumper	MSJ	0.8	\$475.00	\$380.00	Draft correspondence to opposing counsel regarding job titles, discovery extensions and document production
06/18/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Review and draft correspondence to client regarding comparator titles and additional discovery
06/18/2020	Shira Gelfand	SZG	1.1	\$425.00	\$467.50	Correspondence with paralegals re production (.3); Correspondence from client (.6); correspondence with opposing counsel (.2).
06/20/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review proposed joint letter.
06/22/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re tasks BDK missed during PTO.
06/22/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Update docket with new submissions to the court.
06/22/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Update docket with new submissions to the court.
06/22/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Upload docket entries re recently submitted documents to the court.
06/22/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Conference with CEG/SZG regarding case updates, joint letter and next steps regarding discovery.
06/22/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review and revise joint letter and circulate to opposing counsel.
06/22/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review agenda and file in prep for conference with CEG/SZG
06/22/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to opposing counsel regarding joint letter.
06/22/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to opposing counsel regarding joint letter.
06/22/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Review opposing counsel edits to joint letter and draft correspondence to SZG regarding joint letter filing
06/22/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to CEG/SZG regarding scheduling.
06/22/2020	Shira Gelfand	SZG	6.0	\$425.00	\$2,550.00	Prepare agenda for team call (.3); Case management meeting (.4); draft letter to opposing counsel (.7); Review joint letter to court (.8); Review opposing counsel edits (.2); Draft chart re 30(b)(6) topics and necessary documents for deposition, review documents in Nuix (3.2); correspondence with client (.3); Correspondence with MSJ re filing (.2).
06/23/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Save recently filed documents submitted to the court.
06/23/2020	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Weekly status meeting with client.
06/23/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with CEG/SZG and client regarding case updates and next steps.
06/23/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to SZG regarding document review and next steps.
06/23/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review court order regarding discovery extension.
06/23/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence and depo chart from SZG.
06/23/2020	Shira Gelfand	SZG	4.1	\$425.00	\$1,742.50	Call with client (.5); Edit and supplement letter to counsel, send to CEG (.4); Finalize 30(b)(6) chart and documents, send to CEG and MSJ (2.3); Review court order, draft email to client re same (.5); Correspondence with opposing counsel re job titles, review client emails re same(.4).
06/24/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG and MSJ re updating case outline with newly approved dated by the court
06/24/2020	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Update case outline and send to team.
06/24/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Draft correspondence to opposing counsel regarding production of job descriptions
06/24/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from CEG and draft correspondence to client
06/24/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Draft correspondence to client regarding follow up question and incorporate into correspondence to opposing counsel.
06/24/2020	Shira Gelfand	SZG	0.5	\$425.00	\$212.50	Correspondence with client (.3); Correspondence with opposing counsel (.2);
06/29/2020	Shira Gelfand	SZG	0.8	\$425.00	\$340.00	Correspondence with client (.2); Correspondence with opposing counsel (.4); Correspondence with MSJ (.2)
07/06/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting with SZG and MSJ.
07/06/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft agenda for conference with CEG regarding next steps and tasks.
07/06/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference with client regarding case updates and rescheduling meeting.
07/06/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to CEG regarding rescheduling client meeting.
07/07/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference with client regarding case updates and next steps.
07/08/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to CEG regarding correspondence to opposing counsel
07/09/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Draft correspondence to opposing counsel regarding 30b6 deposition and outstanding production
07/09/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Reschedule team call.
07/10/2020	Shira Gelfand	SZG	0.4	\$425.00	\$170.00	Review correspondence with opposing counsel.
07/13/2020	Brian D. Kouassi	BDK	1.3	\$325.00	\$422.50	Download production from opposing counsel.
07/13/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins re uploading Defendant's production
07/13/2020	Christopher C. Alter	CCA	1.2	\$325.00	\$390.00	Import Defendant production to Nuix; correspondence with team re same.
07/13/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review file and prep for team call regarding depositions and discovery
07/13/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with CEG/SZG regarding case update and strategy.
07/13/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to BK regarding document production.
07/13/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review agenda and draft correspondence to CEG/SZG regarding scheduling.
07/13/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from client regarding deposition prep and scheduling
07/13/2020	Naomi Campusano	NCX	0.8	\$350.00	\$280.00	Import defendant's production on Nuix.
07/13/2020	Shira Gelfand	SZG	1.6	\$425.00	\$680.00	Prepare agenda for team meeting (.4); Team meeting (.4); Attention to ESI production (.2); Draft email to client (.6);
07/14/2020	Brian D. Kouassi	BDK	0.8	\$325.00	\$260.00	Update case outline with new dates from the court.
07/14/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Draft and revise correspondence to opposing counsel regarding case updates
07/14/2020	Shira Gelfand	SZG	1.5	\$425.00	\$637.50	Draft email to opposing counsel (.3); review of policy docs (.6); correspondence with bxk re calendaring (.2); Correspondence from client and attachment review (.4).
07/15/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding doc review.
07/15/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from client regarding case background.
07/15/2020	Shira Gelfand	SZG	3.7	\$425.00	\$1,572.50	Correspondence with opposing counsel (.4); doc review (3.3).
07/16/2020	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Case management meeting with SZG.
07/16/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting with SZG, MSJ.
07/16/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review file and draft correspondence to opposing counsel regarding depositions
07/16/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Conference call with CEG/SZG regarding case updates and next steps.
07/16/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review notes from team meeting.
07/16/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review correspondence from SZG, review file and draft correspondence to SZG regarding doc review
07/16/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Draft correspondence to opposing counsel regarding depositions and outstanding discovery issues
07/16/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG regarding revisions to email correspondence to opposing counsel
07/16/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from SZG regarding document review and privilege log

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
07/16/2020	Shira Gelfand	SZG	4.6	\$425.00	\$1,955.00	Doc review (3.1); Correspondence with MSJ and CEG re hot docs (.3); correspondence with DXS re doc format (.2); Correspondence with opposing counsel (.2); case managemtn meeting with CEG and MSJ (.5); draft agenda for meeting (.3); correspondence with client (.1).
07/17/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondence with SZG re sending documents to clients.
07/17/2020	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Prepare documents for clients review.
07/17/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re sending documents to clients for their review.
07/17/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re sending documents to client for their review.
07/17/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re sending documents to clients.
07/17/2020	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Prepare documents for clients review.
07/17/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondence with client re documents for client's review.
07/17/2020	Shira Gelfand	SZG	1.7	\$425.00	\$722.50	Prepare and finalize documents for client review (.8); Correspondence with BXX re production (.3); Correspondence with client (.2); Call with MSJ (.2); Correspondence with DXS (.2).
07/20/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Phonce conference with MSJ and SZG re upcoming depositions.
07/20/2020	Daniel Stromberg	DXS	0.3	\$875.00	\$262.50	Email opposing counsel re: production format deficiencies
07/20/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Conference with CEG/SZG regarding next steps and deposition prep.
07/20/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Conference with SZG/BDK regarding preparation for depositions.
07/20/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review and draft correspondence to DSS regarding ESI protocol.
07/20/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding doc review hot docs.
07/20/2020	Shira Gelfand	SZG	3.2	\$425.00	\$1,360.00	Review client notes on document review, review Nuix for additional attachments and responsive docs (1.2); Prepare agenda for team call (.3); Team call (.5); Call with BXX (.2); Email with BXS (.1); Prepare agenda for client call (.4); Correspondence with client and respond to questions (.6).
07/21/2020	Anna Bostwick	ABX	0.4	\$325.00	\$130.00	Add issue codes to casebook in Nuix.
07/21/2020	Cara E. Greene	CEG	0.8	\$950.00	\$760.00	Telephone call with SZG re discovery issues (.1); review and edit discovery letter to opposing counsel (.2); case update meeting with client (.5).
07/21/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review correspondence from opposing counsel and draft correspondence to opposing counsel regarding 30b6 deposition and outstanding production.
07/21/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to SZG regarding document production.
07/21/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with CEG/SZG and client regarding next steps and case updates.
07/21/2020	Naomi Campusano	NCX	0.7	\$350.00	\$245.00	Create issue codes on Nuix and email team.
07/21/2020	Shira Gelfand	SZG	4.8	\$425.00	\$2,040.00	Prep for client call (.3); Call with client (.7); Review of documents, tag, and prepare production for client (3.2); Correspondence with opposing counsel (.6).
07/22/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Reschedule team call with CEG/SZG.
07/22/2020	Shira Gelfand	SZG	2.6	\$425.00	\$1,105.00	Prepare depo outline for Kevin Lucas, review of documents re same (2.3); Call with MSJ re 30(b)(6) prep (.3)
07/23/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ and SZG re compiling information for upcoming deposition
07/23/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ and SZG re compiling information for upcoming deposition
07/23/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Compile information for upcoming depositions.
07/23/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Phone conference with US Legal re upcoming depositions and requesting court reporter's information
07/23/2020	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Send US Legal Court Reporting to request a court reporter for upcoming deposition on August 12th
07/23/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Send US Legal Court Reporting to request a court reporter for upcoming deposition on August 13th
07/23/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ and SZG re scheduling depositions.
07/23/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG and MSJ re scheduling depositions.
07/23/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG and MSJ re scheduling depositions.
07/23/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re sending documents to the client.
07/23/2020	Brian D. Kouassi	BDK	0.6	\$325.00	\$195.00	Compile documents to send to client for their review.
07/23/2020	Cara E. Greene	CEG	0.7	\$950.00	\$665.00	Case management meeting with SZG, MSJ (.5); review and edit discovery letter (.2).
07/23/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with CEG/SZG regarding case updates and next steps.
07/23/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review correspondence from SZG regarding Ellis.
07/23/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to BK regarding deposition prep.
07/23/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review draft deposition objectives.
07/23/2020	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Review file and draft deposition objectives.
07/23/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from SZG and draft correspondence to CEG/SZG regarding case updates and outstanding discovery.
07/23/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review file; draft correspondence to BK and draft correspondence to SZG regarding deposition scheduling
07/23/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review meeting notes.
07/23/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from BK regarding deposition prep.
07/23/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding deposition prep and document review
07/23/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from CEG and sample mediation statement.
07/23/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from BK regarding depostion scheduling.
07/23/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from CEG/SZG regarding client correspondence.
07/23/2020	Shira Gelfand	SZG	3.6	\$425.00	\$1,530.00	Draft letter response to opposing counsel (.6); Correspondence with BXX re production and deposition notices (.4); Prepare agenda for team meeting (.4); Case management meeting (.5); Correspondence with client (.2); Review and finalize 30(b)(6) topic objectives (.7) Prepare Kevin Lucas documents re personal knowledge (.8).
07/24/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with US Legal Reporting re filling out extra forms for upcoming depositions
07/24/2020	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Fill out forms for US Legal Reporting re upcoming depositions
07/27/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re deposition application.
07/27/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re setting up remote deposition.
07/27/2020	Brian D. Kouassi	BDK	1.4	\$325.00	\$455.00	Draft deposition forms.
07/27/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review agenda for client call with CEG/SZG.
07/27/2020	Shira Gelfand	SZG	1.6	\$425.00	\$680.00	Correspondence with counsel and conduct preliminary research on ESI issue (1.2); Prepare agenda and send to client for call (.4).
07/28/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re deposition bios.
07/28/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Save biography for upcoming deposition witnesses.
07/28/2020	Cara E. Greene	CEG	1.0	\$950.00	\$950.00	Case management meeting with SZG, MSJ (.5); status meeting with client (.5).
07/28/2020	Daniel Stromberg	DXS	2.2	\$875.00	\$1,925.00	Assess defendant ESI productions, create search terms in Nuix, evaluate production rates and custodians; draft email re: deficiencies.
07/28/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Coordinate scheduling for M&C.
07/28/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review file and draft correspondence to DXS regarding M&C.
07/28/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to BK regarding case file.
07/28/2020	Maya S. Jumper	MSJ	0.8	\$475.00	\$380.00	Review correspondence from opposing counsel regarding depositions and discovery issues and draft response regarding same.
07/28/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from opposing counsel regarding meet and confer
07/28/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with client regarding case updates and next steps.
07/28/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Conference call with CEG/SZG regarding case updates and discovery matters.
07/28/2020	Shira Gelfand	SZG	2.1	\$425.00	\$892.50	Prep for client call (.3); Client call (.5); Case management meeting with CEG and MSJ (.4); Correspondence with opposing counsel (.4); correspondence with MSJ and DXS re ESI (.3); correspondence with BXX re deposition logistics (.2).

Rowe v. Google LLC
Case No. 19-cv-08655 (JHR)
Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
07/29/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Pull docket items from the Superior Court of California re Defendant's Pay Equity Analyses
07/29/2020	Daniel Stromberg	DXS	0.2	\$875.00	\$175.00	Advise MSJ re: defendant ESI search and production deficiencies
07/29/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review file and draft correspondence to DXS regarding discovery m&c.
07/29/2020	Maya S. Jumper	MSJ	0.7	\$475.00	\$332.50	Review file and draft outline for M&C with opposing counsel on discovery issues
07/29/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to BK regarding docket pull.
07/29/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Draft correspondence to NC regarding case background and upcoming tasks.
07/29/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from client and draft response regarding same.
07/29/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from co-counsel regarding PC intake.
07/29/2020	Maya S. Jumper	MSJ	1.3	\$475.00	\$617.50	Review file and draft outline for M&C.
07/29/2020	Shira Gelfand	SZG	0.6	\$425.00	\$255.00	Correspondence with client (.2); correspondence with MSJ and DXS (.4).
07/30/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Nuix admin re issues with website.
07/30/2020	Brian D. Kouassi	BDK	0.8	\$325.00	\$260.00	Complete forms needed for deposition.
07/30/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with court reporter re upcoming depositions.
07/30/2020	Brian D. Kouassi	BDK	1.6	\$325.00	\$520.00	Compile deposition documents re upcoming deposition re Bernita Jamison
07/30/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re documents search.
07/30/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re documents search.
07/30/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re documents search for upcoming depositions.
07/30/2020	Brian D. Kouassi	BDK	2.0	\$325.00	\$650.00	Compile documents re upcoming depositions.
07/30/2020	Cara E. Greene	CEG	0.8	\$950.00	\$760.00	Case management meeting, review 30(b)(6) objectives.
07/30/2020	Daniel Stromberg	DXS	0.6	\$875.00	\$525.00	Review opposing counsel email re: ESI issues, review and assess documents at issues, advise MSJ.
07/30/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from BK/SZG regarding deposition scheduling
07/30/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence BK regarding Nuix issues.
07/30/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review file and draft correspondence to DXS regarding outstanding ESI protocol issues
07/30/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with SZG regarding prep for M&C.
07/30/2020	Maya S. Jumper	MSJ	0.7	\$475.00	\$332.50	Lead discovery M&C.
07/30/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence to opposing counsel from SZG and revise.
07/30/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Search and pull documents from Nuix and circulate to BDK
07/30/2020	Shira Gelfand	SZG	4.9	\$425.00	\$2,082.50	Prepare agenda for team meeting (.4); team meeting (.5); prepare for meet and confer, pull Ellis decision re pay studies (1.8); meet and confer (1); debrief with MSJ (.3); draft follow up email to CEG (.6); correspondence with BXX re deposition logistics (.3).
07/31/2020	Brian D. Kouassi	BDK	2.9	\$325.00	\$942.50	Compile relevant hot discovery production for upcoming deposition
07/31/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Compile relevant not-hot discovery production for upcoming deposition
07/31/2020	Brian D. Kouassi	BDK	3.3	\$325.00	\$1,072.50	Compile relevant not-hot discovery production for upcoming deposition
07/31/2020	Cara E. Greene	CEG	0.9	\$950.00	\$855.00	Review case documents.
07/31/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review and draft correspondence to DXS regarding outstanding ESI issues.
07/31/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Draft correspondence to BK regarding doc review and prep for 306b depo
07/31/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG regarding binder prep.
07/31/2020	Shira Gelfand	SZG	1.7	\$425.00	\$722.50	Document review for 30(b)(6) (1.4); correspondence with CEG and MSJ re binders (.3)
08/03/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondence with deposition scheduler re deposition date change.
08/03/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with US Legal re streaming platform.
08/03/2020	Brian D. Kouassi	BDK	2.1	\$325.00	\$682.50	Compile relevant not-hot discovery production for upcoming deposition
08/03/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ and SZG re Not Hot Relevant documents.
08/03/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting.
08/03/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with CEG/SZG regarding case updates and next steps.
08/03/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG regarding updating deposition scheduling
08/03/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG regarding revisions to correspondence to opposing counsel
08/03/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review agenda from SZG.
08/03/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from SZG regarding potential deponents.
08/03/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to BK regarding doc review.
08/03/2020	Shira Gelfand	SZG	4.6	\$425.00	\$1,955.00	Prepare agenda for team meeting (.6); Case management meeting (1); Correspondence with BXX re depositions (.3); Review EPL standard and edit objectives, bio, and topics (1.7); prepare list of potential deponents for CEG and MSJ (.3); Send agenda and list to client (.7).
08/04/2020	Anna Bostwick	ABX	0.5	\$325.00	\$162.50	Import defendant production into Nuix.
08/04/2020	Brian D. Kouassi	BDK	1.3	\$325.00	\$422.50	Download discovery production from Opposing Counsel.
08/04/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re uploading Defendant's production.
08/04/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins re uploading Defendant's production to Ringtail
08/04/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail Admins re recent production from opposing counsel
08/04/2020	Christopher C. Alter	CCA	0.5	\$325.00	\$162.50	Import Defendant production to Nuix; correspondence with team re same.
08/04/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Client meeting.
08/04/2020	Daniel Stromberg	DXS	0.2	\$875.00	\$175.00	Advise MSJ re: defendant creation of document in response to discovery request.
08/04/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Conference with CEG/SZG regarding case updates and next steps.
08/04/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from CEG regarding scheduling.
08/04/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from opposing counsel regarding deposition start time.
08/04/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Conference with ATK/CDY regarding client case updates.
08/04/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to DXS regarding authentication of document production
08/04/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review deposition prep materials from SZG.
08/04/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to opposing counsel regarding deposition logistics and outstanding discovery
08/04/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review file; draft correspondence to DXS regarding opposing counsel's document production
08/04/2020	Naomi Campusano	NCX	1.0	\$350.00	\$350.00	Import defendant's production into Nuix and correspondence with team re same
08/04/2020	Shira Gelfand	SZG	4.4	\$425.00	\$1,870.00	Prep for client meeting (.3); Client meeting (.6); Continue drafting Kevin Lucas outline (.7); correspondence with opposing counsel re deposition logistics (.3); correspondence with MSJ and DXS re Google document spreadsheet (.3); begin document review (2.2).
08/05/2020	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Review and edit discovery deficiency letter.
08/05/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review and revise correspondence from SZG to opposing counsel.
08/05/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Review correspondence with team re document upload to Nuix.
08/05/2020	Shira Gelfand	SZG	5.2	\$425.00	\$2,210.00	Finish review of Google's recent production (2.3); Compile 30(b)(6) documents, prepare for CEG (1.3); draft letter to opposing counsel, review of court orders and previous correspondence re: same (1.6);.
08/06/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MWSJ and SZG re updating court reporter with new time of deposition
08/06/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MWSJ and SZG re updating court reporter with new time of deposition
08/06/2020	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Correspondence with US Legal re updating them on the new deposition start time.
08/06/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG and MSJ re preparing case documents for upcoming depositions
08/06/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG and MSJ re preparing case documents for upcoming depositions
08/06/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG and MSJ re preparing deposition notices.
08/06/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with US Legal Reporting re schedule of court reporter for upcoming depositions
08/06/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG and MSJ re schedule of court reporter for upcoming depositions
08/06/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Prepare deposition notices.

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
08/06/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG and MSJ re draft deposition notices.
08/06/2020	Brian D. Kouassi	BDK	1.1	\$325.00	\$357.50	Review and compile documents for deposition copies.
08/06/2020	Cara E. Greene	CEG	2.8	\$950.00	\$2,660.00	Review case related documents (2.3); case management meeting (.5).
08/06/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from BK regarding deposition scheduling.
08/06/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review and revise deposition objectives.
08/06/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with SZG regarding ESI letter to court.
08/06/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding meeting agenda.
08/06/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with CEG/SZG regarding case updates.
08/06/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to opposing counsel regarding ESI protocol stip
08/06/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Review correspondence with team re document production.
08/06/2020	Shira Gelfand	SZG	5.5	\$425.00	\$2,337.50	Prepare agenda for meeting (.4); Case management meeting (.5); Call with MSJ re letter motion to court (.2); Correspondence with BKK re assignments (.3); Correspondence with opposing counsel (.2); organization of hot docs for CEG review (.8); Begin drafting letter to court (2.3); Review documents for comparator offer letter comp, prepare chart (.8).
08/07/2020	Anna Bostwick	ABX	0.2	\$325.00	\$65.00	Answer Nuix questions re batch printing in chronological order
08/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Phone conference with US Legal re court reporter.
08/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Phone conference with US Legal re court reporter.
08/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re deposition binders.
08/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re deposition binders.
08/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re court reporter.
08/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re court reporter.
08/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with US Legal re court reporter.
08/07/2020	Brian D. Kouassi	BDK	4.3	\$325.00	\$1,397.50	Compile and review documents for upcoming deposition binders
08/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with printer company re print job.
08/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Phone conference with printing company re deposition binders
08/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with printing company re deposition binders
08/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Phone conference with printing company re deposition binders
08/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Send printing company extra cover letters.
08/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Phone conference with printing company re deposition binders
08/07/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Phone conference with printing company re deposition binders
08/07/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondence with printing company re deposition binders
08/07/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference with SZG regarding letter motion.
08/07/2020	Maya S. Jumper	MSJ	0.8	\$475.00	\$380.00	Review draft letter motion.
08/07/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to CEG regarding deposition scheduling and letter motion
08/07/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with CEG/SZG regarding case updates and next steps.
08/07/2020	Shira Gelfand	SZG	4.1	\$425.00	\$1,742.50	Call with CEG (.1); Correspondence with opposing counsel (.2); Correspondence with US Legal re deposition swearing in (.2); Continue drafting letter to court, conduct legal research re same (3.3); edit deposition notices (.3).
08/08/2020	Maya S. Jumper	MSJ	2.1	\$475.00	\$997.50	Conduct legal research and revise letter to court regarding ESI/comparator evidence.
08/08/2020	Shira Gelfand	SZG	4.3	\$425.00	\$1,827.50	Review of documents for 30(b)(6) equal pay prep and correspondence with CEG and MSJ re same
08/10/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re assignment and phone conference.
08/10/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with printing company re finalize deposition binders
08/10/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Set-up phone conference with SZG re upcoming assignment.
08/10/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Phone conference with SZG re assignment for upcoming depositions.
08/10/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re rescheduling deposition.
08/10/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with US Legal re canceled deposition.
08/10/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re sending documents to client for review.
08/10/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with US Legal re cancellation of deposition.
08/10/2020	Brian D. Kouassi	BDK	5.0	\$325.00	\$1,625.00	Collect data on positions, titles, and names of Google Level 8 and Level 9 employees for upcoming Depositions
08/10/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting.
08/10/2020	Daniel Stromberg	DXS	1.7	\$875.00	\$1,487.50	Review opposing counsel email re: ESI search term results and sufficiency; advise MSJ and SZG (.3); review MSJ draft letter re: ESI search deficiencies, edit and advise, identify and assemble exemplar documents re: search terms at issue for MSJ review (1.1); investigate SZG document issues and advise re: defendant replacement production (.3).
08/10/2020	Maya S. Jumper	MSJ	0.8	\$475.00	\$380.00	Conduct legal research to supplement letter to court.
08/10/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Draft correspondence to opposing counsel regarding discovery disputes and depositions
08/10/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference with SZG regarding draft letter to court.
08/10/2020	Maya S. Jumper	MSJ	0.7	\$475.00	\$332.50	Conference with CEG/SZG regarding case updates and next steps.
08/10/2020	Shira Gelfand	SZG	6.9	\$425.00	\$2,932.50	Attention to review of binders and adding relevant policy documents (1.2); Prepare meeting agenda (.4); Team meeting (.5); Edit and supplement chart of L8-9 employees with gender breakdown (1.3); Correspondence with BKK (.4); call with MSJ (.2); Edit and supplement motion letter, correspondence with DXS re same (2.3); correspondence with opposing counsel (.2); Correspondence with client and discussion of documents (.4).
08/11/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Phone conference with SZG re deposition documents.
08/11/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re planning a phone conference re deposition binders
08/11/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re issues with Ringtail.
08/11/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Review issues with Ringtail and contact admins.
08/11/2020	Brian D. Kouassi	BDK	4.8	\$325.00	\$1,560.00	Collect data on positions, titles, and names of Google Level 8 and Level 9 employees for upcoming Depositions
08/11/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re Level 8 and Level 9 employees.
08/11/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with JGCA re correspondence with client re investigation into ConvergeOne.
08/11/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with client re investigation into ConvergeOne.
08/11/2020	Cara E. Greene	CEG	0.6	\$950.00	\$570.00	Weekly client meeting.
08/11/2020	Cara E. Greene	CEG	1.5	\$950.00	\$1,425.00	Review case documents.
08/11/2020	Cara E. Greene	CEG	0.9	\$950.00	\$855.00	Review and edit letter to the court.
08/11/2020	Daniel Stromberg	DXS	0.4	\$875.00	\$350.00	Review opposing counsel email re: ESI stipulation, advise MSJ (.3); advise SZG re: bulk export of native xls documents (.1).
08/11/2020	Maya S. Jumper	MSJ	0.7	\$475.00	\$332.50	Incorporate SZG edits, revise and circulate letter to Ct for CEG for review.
08/11/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review and revise letter to incorporate DXS eds.
08/11/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Schedule depo prep with CEG.
08/11/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from DXS regarding outstanding ESI issues.
08/11/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to CEG regarding deposition scheduling and letter review.
08/11/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from CEG regarding review and depositions.
08/11/2020	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Draft correspondence to opposing counsel regarding outstanding discovery issues.
08/11/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Correspondence with SZG re batch printing native files on Nuix.
08/11/2020	Sara Olson	SXO	0.4	\$350.00	\$140.00	Pull native excel documents from Defendant's production on compile in case file from Nuix
08/11/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Quality check at reproduced documents with errors on Nuix.
08/11/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Review correspondence with SZG and DXS re Defendant's reproductions and overlay copies on Nuix

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
08/11/2020	Shira Gelfand	SZG	6.5	\$425.00	\$2,762.50	Prepare for client call (.4); Call with client (.5); call with CEG and MSJ (.3); Call with BKK and correspondence re L8-L5 positions and binder (.8); Call with CEG (.1); Call with MSJ (.2); Correspondence with counsel (.2); Review of hit report and search terms (.6); attention to binders and review of documents in office, (.3.2); Correspondence with ringtail admins re pulling excel files into Y drive (.2).
08/12/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re edits to sheet re L8 and L9 employees.
08/12/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re full list of 2017 L8 and L9 employees
08/12/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re revising the Scheduling Order with new dates.
08/12/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re revising scheduling order.
08/12/2020	Brian D. Kouassi	BDK	1.1	\$325.00	\$357.50	Revise scheduling order with new dates.
08/12/2020	Brian D. Kouassi	BDK	3.3	\$325.00	\$1,072.50	Collect data on positions, titles, and names of Google Level 8 and Level 9 employees for upcoming Depositions
08/12/2020	Cara E. Greene	CEG	3.3	\$950.00	\$3,135.00	Review and edit revised letter to the court (.8); review documents (2.5).
08/12/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review file and draft correspondence to opposing counsel regarding discovery extension
08/12/2020	Maya S. Jumper	MSJ	0.8	\$475.00	\$380.00	Revise letter and draft correspondence to opposing counsel regarding request for extension
08/12/2020	Shira Gelfand	SZG	6.1	\$425.00	\$2,592.50	Edit and supplement letter to court, prepare exhibits (3.7); Correspondence with opposing counsel (.2); Call with MSJ (.3); Begin drafting interrogatories (1.9);.
08/13/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re upcoming filing to the court.
08/13/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with US Legal re rescheduling deposition dates.
08/13/2020	Brian D. Kouassi	BDK	3.8	\$325.00	\$1,235.00	Collect data on positions, titles, and names of Google Level 8 and Level 9 employees for upcoming Depositions
08/13/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re data on positions, titles, and names of Google Level 8 and Level 9 employees for upcoming Depositions.
08/13/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re data on positions, titles, and names of Google Level 8 and Level 9 employees for upcoming Depositions.
08/13/2020	Brian D. Kouassi	BDK	1.4	\$325.00	\$455.00	Revise and insert SZG's edits on data of positions, titles, and names of Google Level 8 and Level 9 employees for upcoming Depositions.
08/13/2020	Cara E. Greene	CEG	1.1	\$950.00	\$1,045.00	Review and edit Plaintiff's second set of interrogatories (.5); case management meeting (.4); correspondence re letter to the court (.2).
08/13/2020	Maya S. Jumper	MSJ	1.0	\$475.00	\$475.00	Review file and revise second set of interrogatories.
08/13/2020	Shira Gelfand	SZG	5.1	\$425.00	\$2,167.50	Correspondence with opposing counsel (.2); Prepare agenda for team call (.4); case management meeting (.7); call with MSJ (.3); draft conflict waiver (.6); edit and supplement letter motion and exhibits (1.2) Edit and supplement ROGs (1.3); correspondence with BKK and review of gender breakdown of L8-9 (.4).
08/14/2020	Brian D. Kouassi	BDK	1.6	\$325.00	\$520.00	Revise and insert edits to data on positions, titles, and names of Google Level 8 and Level 9 employees for upcoming Depositions.
08/14/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re revise data of L8 and L9 employees.
08/14/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re upcoming filing in the SDNY.
08/14/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review and revise 2nd Set of Interrogatories.
08/14/2020	Shira Gelfand	SZG	2.0	\$425.00	\$850.00	Continue drafting interrogatories, send to CEG and MSJ (1.3); Review BKK updated gender breakdown (.6); correspondence with MSJ re letter motion (.1).
08/17/2020	Anna Bostwick	ABX	0.2	\$325.00	\$65.00	Download production with Veracrypt.
08/17/2020	Brian D. Kouassi	BDK	0.7	\$325.00	\$227.50	Fix production issues with Ringtail admins and IT department.
08/17/2020	Brian D. Kouassi	BDK	1.1	\$325.00	\$357.50	Download production from opposing counsel.
08/17/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins re uploading production to Ringtail
08/17/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins re issues with production.
08/17/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins re issues with production.
08/17/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail re Defendant's Production.
08/17/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail re Defendant's Production.
08/17/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re downloading Defendant's documents re review.
08/17/2020	Brian D. Kouassi	BDK	0.8	\$325.00	\$260.00	Download Defendant's production from Ringtail re Attorney's review.
08/17/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re documents to review.
08/17/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG and MSJ re payment to SiteLogistix.
08/17/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Review and finalize interrogatories and service.
08/17/2020	Daniel Stromberg	DXS	0.3	\$875.00	\$262.50	Investigate technical issues with defendant production documents, coordinate resolution
08/17/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Circulate completed import to team for attorney review on Nuix
08/17/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Correspondence with BDK and team re veracrypt software for downloading Defendant's productions
08/17/2020	Sara Olson	SXO	0.6	\$350.00	\$210.00	Import Defendant's productions to Nuix.
08/17/2020	Shira Gelfand	SZG	3.7	\$425.00	\$1,572.50	Edit and supplement interrogatories, review comparator definition under EPA (1.2); Begin document review of internal complaints (2.3) ; correspondence with RT team re spreadsheet (.2).
08/18/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG and MSJ re sending Defendant's production to client.
08/18/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG and MSJ re sending Defendant's production to client.
08/18/2020	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Prepare Defendant's production to send to client for their review
08/18/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with client re reviewing Defendant's document production.
08/18/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re upcoming filing in the SDNY.
08/18/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re upcoming filing.
08/18/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re upcoming filing.
08/18/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with BXS re covering for upcoming filing
08/18/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with paralegal regarding covering for upcoming filing
08/18/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence CEG and MSJ re finalizing letter and file to SDNY.
08/18/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with CEG, MSJ, and SZG re filing.
08/18/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondence with MSJ re exhibits.
08/18/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re finalizing documents.
08/18/2020	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Finalize letter to Court for upcoming filing.
08/18/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	File letter to the court re Pursuant to Section 2.A and Local Rule 37.2
08/18/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting.
08/18/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Review and edit letter to the court and correspondence re same.
08/18/2020	Daniel Stromberg	DXS	0.3	\$875.00	\$262.50	Resolve technical issues with defendant production documents, rename native files and update Nuix index
08/18/2020	Maya S. Jumper	MSJ	1.5	\$475.00	\$712.50	Review document production and draft depo outline.
08/18/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with CEG/client regarding case updates.
08/18/2020	Maya S. Jumper	MSJ	0.8	\$475.00	\$380.00	Coordinate and monitor filing of ltr to court
08/18/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Trouble shoot native file imports on Nuix; correspondence with DXS re same
08/18/2020	Shira Gelfand	SZG	1.3	\$425.00	\$552.50	Review finalized interrogatories, calendar deadline to respond (.8); correspondence re ftp (.2); correspondence and review letter motion (.3).
08/19/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re production documents.
08/19/2020	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Update case folders with recent filings and documents sent to clients.
08/19/2020	Brian D. Kouassi	BDK	2.1	\$325.00	\$682.50	Download case documents for attorney's review.
08/19/2020	Brian D. Kouassi	BDK	1.5	\$325.00	\$487.50	Download case documents for attorney's review.
08/19/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondence with MSJ re document production.
08/19/2020	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Review and edit letter to opposing counsel re confidentiality of complaints; correspondence with MSJ, SZG re same

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
08/19/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference with CEG regarding complaint docs and 30(b)(6) depo.
08/19/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review document production.
08/19/2020	Maya S. Jumper	MSJ	2.2	\$475.00	\$1,045.00	Draft 30b6 deposition outline.
08/19/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to BK regarding document review/pull.
08/19/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to BK regarding doc review assignment.
08/19/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Draft correspondence to CEG with add'l doc for depo prep call
08/19/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review notes from depo prep call with CEG.
08/19/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Draft correspondence to CEG/SZG regarding correspondence to opposing counsel regarding document production, priv log, and deposition.
08/19/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Revise draft correspondence to opposing counsel with CEG eds.
08/19/2020	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Correspondence with MSJ.
08/20/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SXO re Ringtail issues.
08/20/2020	Brian D. Kouassi	BDK	2.6	\$325.00	\$845.00	Revise documents categorize as Relevant Not-Hot.
08/20/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re updated Relevant Not-Hot documents.
08/20/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re compiling documents for upcoming production and depositions
08/20/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re compiling documents for upcoming production and depositions
08/20/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re compiling documents for upcoming production and depositions
08/20/2020	Cara E. Greene	CEG	1.8	\$950.00	\$1,710.00	Review documents.
08/20/2020	Maya S. Jumper	MSJ	1.9	\$475.00	\$902.50	Review file and prepare for M&C.
08/20/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to opposing counsel regarding M&C and outstanding discovery issues.
08/20/2020	Maya S. Jumper	MSJ	1.7	\$475.00	\$807.50	Review file; draft outline for M&C.
08/20/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review correspondence and draft letter from SZG regarding joint status report.
08/20/2020	Shira Gelfand	SZG	1.8	\$425.00	\$765.00	Correspondence with opposing counsel (.6); Prepare agenda for team call (.3); Case mgmt meeting (.5); Correspondence with BXK re depositions (.2); Call with MSJ (.2).
08/21/2020	Brian D. Kouassi	BDK	2.4	\$325.00	\$780.00	Compressed large documents for production re deposition.
08/21/2020	Cara E. Greene	CEG	2.9	\$950.00	\$2,755.00	Review and edit joint status letter and correspondence with MSJ, SZG re same; review correspondence form opposing counsel; correspondence re confidential document on the docket (.7); review binders for deposition (2.2).
08/21/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Lead M&C with SZG & opposing counsel.
08/21/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Prepare for M&C with SZG & opposing counsel.
08/21/2020	Maya S. Jumper	MSJ	0.8	\$475.00	\$380.00	Review correspondence opposing counsel regarding M&C follow up and draft correspondence in response
08/21/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review CEG eds to joint status letter.
08/21/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review filed joint status report.
08/21/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review court rules and confidentiality order.
08/21/2020	Shira Gelfand	SZG	5.7	\$425.00	\$2,422.50	Prepare for meet and confer (.8); meet and confer (.5); edit and supplement 2 rounds of letters (3.7); correspondence re filing under seal and review judge rules (.7).
08/24/2020	Brian D. Kouassi	BDK	4.0	\$325.00	\$1,300.00	Download and compile document production re Relevant documents
08/24/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Update Docket with recent filings and Orders from the court.
08/24/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting.
08/24/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with CEG/SZG regarding case updates and next steps.
08/24/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with SZG regarding debrief and next steps.
08/24/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review court order regarding discovery issues.
08/24/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review file and meeting agenda in prep for team call with CEG/SZG.
08/24/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding correspondence to client regarding discovery ruling
08/24/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review court procedure regarding docket corrections/sealing.
08/24/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Call chambers regarding sealing request.
08/24/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence and second privilege log from opposing counsel
08/24/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from opposing counsel and draft correspondence to opposing counsel regarding docket correction effort.
08/24/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from opposing counsel regarding M&C scheduling and draft response
08/24/2020	Shira Gelfand	SZG	4.7	\$425.00	\$1,997.50	Prepare agenda for team call (.4); Case mgmt mtg with MSJ and CEG (.5); Review defendants letter response to court (.8); Review court order (.6); Prepare letter to client (.7); correspondence with MSJ (.2) correspondence with opposing counsel (.3); review privilege log and redaction logs (1.2).
08/25/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re correspondence with client.
08/25/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with client re Defendant's Production.
08/25/2020	Brian D. Kouassi	BDK	2.4	\$325.00	\$780.00	Compress files for review and upcoming depositions re Relevant - Not Hot documents
08/25/2020	Brian D. Kouassi	BDK	1.5	\$325.00	\$487.50	Compress files for review and upcoming depositions re Relevant - Hot documents.
08/25/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re updated discovery schedule.
08/25/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Draft new dates re updated Discovery Schedule.
08/25/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re upcoming filing.
08/25/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re delay in filing.
08/25/2020	Cara E. Greene	CEG	1.0	\$950.00	\$950.00	Prepare for meet and confer call and participate in same.
08/25/2020	Daniel Stromberg	DXS	0.7	\$875.00	\$612.50	Report defendant ESI search term production counts to MSJ and advise re: potential deficiencies
08/25/2020	Maya S. Jumper	MSJ	0.9	\$475.00	\$427.50	Lead M&C with SZG and opposing counsel regarding discovery disputes.
08/25/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to SDNY Help Desk regarding docket correction.
08/25/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to DXS regarding ESI M&C.
08/25/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft follow up correspondence to DXS regarding ESI M&C prep.
08/25/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review correspondence from DXS regarding ESI analysis for M&C.
08/25/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to CEG regarding ESI analysis for M&C.
08/25/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG to opposing counsel.
08/25/2020	Maya S. Jumper	MSJ	1.3	\$475.00	\$617.50	Review file and prepare for M&C.
08/25/2020	Shira Gelfand	SZG	6.4	\$425.00	\$2,720.00	Prep for meet and confer with counsel, including review of search terms, RFPs and documents (3.3); meet and confer and debrief with CEG and MSJ (1.2); draft email to counsel re joint filing to seal (.5); correspondence with client, MSJ and BXK re FTP and complaint documents (.6); review of Google's proposed joint letter to Court, review Court rules re same (.8).
08/26/2020	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence with MSJ re confidential document filing.
08/26/2020	Maya S. Jumper	MSJ	0.7	\$475.00	\$332.50	Review correspondence and revise letter to court.
08/26/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review correspondence and draft joint letter from opposing counsel regarding sealing/docket correction
08/26/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to CEG regarding docket correction issue and next steps for sealing
08/26/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review correspondence from CEG and revise draft joint letter regarding sealing/docket correction
08/26/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to parastaffing regarding zip file creation.
08/26/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review and draft correspondence to SZG regarding scheduling.
08/26/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review correspondence from NXC and draft correspondence to client regarding document production
08/26/2020	Naomi Campusano	NCX	0.6	\$350.00	\$210.00	Prepare and send file to client.
08/26/2020	Shira Gelfand	SZG	1.5	\$425.00	\$637.50	Attention to edits to joint letter, correspondence with MSJ re same (.7); Draft letter update to client (.6); review filing on docket (.2).
08/27/2020	Shira Gelfand	SZG	0.9	\$425.00	\$382.50	Draft update to client (.7); review ECF filing (.2).

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
08/28/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re newly pulled and compressed documents.
08/28/2020	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Finalize compressed documents and prepare for attorney's review.
08/28/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Update Docket with new filings from the SDNY.
08/31/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re rescheduled depositions.
08/31/2020	Shira Gelfand	SZG	2.1	\$425.00	\$892.50	Correspondence with BKK (.2); Prepare agenda for team call (.4); Case management meeting with MSJ (.3);
09/01/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Correspondence with opposing counsel (.4); Begin drafting of Tariq Shaukat depo outline, review of documents (.8).
09/01/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence and draft correspondence regarding scheduling.
09/01/2020	Shira Gelfand	SZG	5.3	\$425.00	\$2,252.50	Review correspondence and draft correspondence to SZG regarding outstanding discovery issues. Correspondence with client (.2); Full review of complaint documents (3.3); correspondence with CEG and MSJ (.2); Correspondence with opposing counsel (.3); Continue drafting Tariq Shaukat deposition objectives and bio/case background (1.3).
09/02/2020	Shira Gelfand	SZG	3.2	\$425.00	\$1,360.00	Review meet and confer notes, draft agenda and synopsis for upcoming meet and confer, correspondence with MSJ and CEG re same (1.3); Correspondence with BKK re deposition logistics and scheduling (.2); Begin drafting Stuart Breslow background, bio, and deposition objectives (1.4); correspondence with DXS re ESI and meet and confer update (.3).
09/03/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to client regarding scheduling.
09/08/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re re-scheduling deposition dates with US Legal.
09/08/2020	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Conference with SZG, MSJ to discuss discovery conference.
09/08/2020	Cara E. Greene	CEG	0.6	\$950.00	\$570.00	Telephone call with client.
09/08/2020	Maya S. Jumper	MSJ	1.0	\$475.00	\$475.00	Meet and confer with CEG/SZG and opposing counsel regarding outstanding discovery issues.
09/08/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review file and prepare for M&C.
09/08/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference call with CEG/SZG regarding debrief from M&C.
09/08/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to client regarding conflict check.
09/08/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Conference call with client/SZG regarding case updates.
09/08/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG to opposing counsel regarding discovery issue.
09/08/2020	Shira Gelfand	SZG	4.8	\$425.00	\$2,040.00	Prep for meet and confer (.8); Meet and confer (1.1); Case management meeting (.4); Draft email to opposing counsel (.7); Prepare agenda for client call (.2); client call (.5); edit and supplement draft email and prepare deposition notices, correspondence with CEG and MSJ re same (1.1).
09/09/2020	Cara E. Greene	CEG	2.0	\$950.00	\$1,900.00	Review documents.
09/09/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to opposing counsel regarding outstanding disco issues.
09/09/2020	Shira Gelfand	SZG	0.5	\$425.00	\$212.50	Correspondence with client (.1); Edit and supplement email to counsel (.2); review conflict waiver (.2)
09/10/2020	Shira Gelfand	SZG	5.1	\$425.00	\$2,167.50	Review of documents, edit and supplement objectives for Tariq Shaukat and Stuart Breslow (2.3); Correspondence with CEG and MSJ re depo notices (.2); Review of documents with attention to potential additional deponents (1.2); Correspondence with opposing counsel, prepare response on discoverable information of deponents (1.4).
09/11/2020	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Review and edit letter to opposing counsel.
09/11/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to SZG regarding scheduling and complaint files
09/11/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review and revise correspondence to opposing counsel regarding outstanding discovery and complaints of discrimination.
09/11/2020	Shira Gelfand	SZG	0.9	\$425.00	\$382.50	Correspondence with counsel (.3); Correspondence with CEG and MSJ (.3); Correspondence with client (.1); Draft response re deposition notices (.2).
09/14/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re scheduling upcoming depositions.
09/14/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re deposition preparation.
09/14/2020	Brian D. Kouassi	BDK	1.5	\$325.00	\$487.50	Prepare deposition forms for upcoming depositions for US Legal
09/14/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondence with US Legal re new deposition dates.
09/14/2020	Shira Gelfand	SZG	1.6	\$425.00	\$680.00	Prepare meeting agenda (.4); correspondence with CEG and MSJ (.2); Correspondence with client (.1); correspondence with opposing counsel and review of potential dates for depositions (.6); Correspondence with BKK and vendor re depositions (.3).
09/15/2020	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Telephone call with SZG re discovery issues.
09/15/2020	Maya S. Jumper	MSJ	0.7	\$475.00	\$332.50	Lead M&C with SZG regarding discovery.
09/15/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding debrief correspondence to CEG
09/15/2020	Maya S. Jumper	MSJ	1.7	\$475.00	\$807.50	Review file and prepare for M&C.
09/15/2020	Shira Gelfand	SZG	3.9	\$425.00	\$1,657.50	Correspondence with client (.2); Prep for meet and confer, review of complaint documents (1.2); Call with MSJ and CEG (.2); meet and confer (1.0); Recap with MSJ, calendar new depo dates, draft recap for CEG review (1.3).
09/16/2020	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence with SZG re deposition scheduling.
09/16/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with CEG/SZG and client regarding case updates.
09/16/2020	Shira Gelfand	SZG	1.9	\$425.00	\$807.50	Correspondence with opposing counsel (.4); Review of complaint documents, begin preparing list of narrowed relevant complaint docs (1.3); correspondence with MSJ and CEG (.2).
09/17/2020	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Correspondence with US Legal re re-schedule depositions.
09/17/2020	Brian D. Kouassi	BDK	2.2	\$325.00	\$715.00	Download production from Defendant's counsel.
09/17/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with US Legal re depositions.
09/17/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with US Legal re depositions.
09/17/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins re uploading defendant's production
09/17/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting with SZG, MSJ.
09/17/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with CEG/SZG regarding case updates.
09/17/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to client regarding conflict waiver.
09/17/2020	Maya S. Jumper	MSJ	1.3	\$475.00	\$617.50	Review file and draft correspondence to opposing counsel regarding M&C issues.
09/17/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from client regarding conflict waiver.
09/17/2020	Naomi Campusano	NCX	0.4	\$350.00	\$140.00	Download production and save in case file.
09/17/2020	Naomi Campusano	NCX	1.5	\$350.00	\$525.00	Import defendant's production into Nuix and email team re same.
09/17/2020	Shira Gelfand	SZG	5.4	\$425.00	\$2,295.00	Correspondence with CEG and MSJ (.3); Prepare agenda (.6); Correspondence with BKK re depos (.3); Call with MSJ (.5); Review documents for additional deponent information- Stuart Vardaman and Chris Humez (1.2); Begin doc review of new production (2.3); correspondence with client re conflict waiver (.2).
09/18/2020	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Review and edit correspondence to opposing counsel.
09/18/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding correspondence to opposing counsel and deposition strategy
09/18/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to CEG regarding correspondence to opposing counsel
09/18/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review correspondence from opposing counsel and draft response regarding production of complaints
09/18/2020	Shira Gelfand	SZG	3.3	\$425.00	\$1,402.50	Document review (2.6); Edit letter to opposing counsel, correspondence with CEG and MSJ re additional deponents (.7).
09/21/2020	Cara E. Greene	CEG	0.7	\$950.00	\$665.00	Case management meeting with SZG, MSJ.
09/21/2020	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Review file and 9/14 document production.
09/21/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to opposing counsel regarding deposition notice
09/21/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with CEG/SZG regarding case updates and next steps.
09/21/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Revise and send correspondence to opposing counsel regarding complaint production
09/21/2020	Sara Olson	SXO	0.2	\$350.00	\$70.00	Review correspondence with team re production uploads to Nuix

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
09/21/2020	Shira Gelfand	SZG	6.1	\$425.00	\$2,592.50	Prepare agenda for team meeting (.6); Continue document review of new production (2.8); case management meeting (.6); Call with MSJ (.2); Correspondence with BXK re assignments (.3); Prepare Adam Lief documents (1.4); Correspondence with opposing counsel (.2).
09/22/2020	Brian D. Kouassi	BDK	0.7	\$325.00	\$227.50	Prepare depositions notices.
09/22/2020	Brian D. Kouassi	BDK	0.9	\$325.00	\$292.50	Prepare binder covers and binder spine for upcoming deposition binders
09/22/2020	Brian D. Kouassi	BDK	1.2	\$325.00	\$390.00	Prepare binder for printing company.
09/22/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re deposition binders.
09/22/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re deposition binders.
09/22/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re deposition binders.
09/22/2020	Brian D. Kouassi	BDK	1.6	\$325.00	\$520.00	Export job descriptions for upcoming deposition questioning
09/22/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with printing company re print job.
09/22/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with printing company re print job.
09/22/2020	Daniel Stromberg	DXS	0.2	\$875.00	\$175.00	Advise SZG re: Google email production deficiencies and possible remedies
09/22/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with CEG/SZG and client regarding case updates.
09/22/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Conference with SZG regarding discovery and depositions.
09/22/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to CEG regarding depo schedule.
09/22/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Conference with client regarding case update and next steps.
09/22/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review file and draft correspondence to SZG regarding document production issue
09/22/2020	Shira Gelfand	SZG	6.2	\$425.00	\$2,635.00	Prep for client call (.4); Call with client (.6); Prep and finalize Kevin Lucas and Adam Lief document review binders, correspondence with BXK re same (3.3); Correspondence with MSJ and DXS re document issues (.3); correspondence with opposing counsel (.2); Correspondence with SiteLogistix (.2) Correspondence with CEG re documents and deposition (.1); Attention to job description data, prepare for Adam Lief deposition (1.2).
09/23/2020	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Export job descriptions for upcoming deposition questioning
09/23/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re depositions job descriptions.
09/23/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with printing company re binders.
09/23/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with printing company re binders.
09/23/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from opposing counsel regarding deposition scheduling and draft correspondence to CEG/SZG regarding same.
09/23/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from CEG regarding deadlines and draft response.
09/23/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from CEG regarding scheduling and document review.
09/23/2020	Shira Gelfand	SZG	3.9	\$425.00	\$1,657.50	Correspondence with MSJ (.2); correspondence with BXK re assignment and binders (.3); Review and analysis of job description documents, correspondence with CEG and MSJ re same, prep for Adam Lief depo (2.6); Finalize Stuart Breslow and Tariq Shaukat objectives, send to MSJ (.8).
09/24/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review file and draft correspondence to CEG regarding discovery ext.
09/24/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review and revise draft correspondence from SZG to opposing counsel
09/24/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to CEG/SZG regarding next steps regarding depositions and scheduling extension.
09/24/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to CEG/SZG regarding case updates.
09/24/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG regarding deponent selection.
09/24/2020	Shira Gelfand	SZG	5.5	\$425.00	\$2,337.50	Review Google's responses to interrogatories, crosscheck documents, correspondence with CEG and MSJ re same (2.3); Correspondence re binders for depositions (.3); Correspondence with MSJ and CEG re possible deponent, review relevant documents (1.7); Prepare meeting agenda (.2); Correspondence with client (.4); Correspondence with MSJ re Diane Green subpoena and attention to preparation (.6).
09/25/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re remote deposition set up.
09/25/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re pulling the relevant and relevant Hot docs from the most recent production and prepare a portfolio view.
09/25/2020	Brian D. Kouassi	BDK	1.6	\$325.00	\$520.00	Pull the relevant and relevant Hot docs from the most recent production and prepare a portfolio view
09/25/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Conference with SZG regarding case updates and next steps.
09/25/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to CEG regarding deponent selection.
09/25/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding subpoena and draft response.
09/25/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Draft correspondence to opposing counsel regarding depositions and outstanding discovery issues
09/25/2020	Shira Gelfand	SZG	3.8	\$425.00	\$1,615.00	Attention to depo binders (.8); Call with MSJ (.3); Correspondence with BXK (.4); Meeting with CEG re outstanding items (.3); Attention to document review, exhibit gathering, and production for deposition (1.3); Correspondence with paralegals re subpoena, review draft (.6); Draft agenda re outstanding tasks to team (.7).
09/28/2020	Brian D. Kouassi	BDK	1.8	\$325.00	\$585.00	Finalize and pull documents for their review.
09/28/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re upcoming document production project
09/28/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re upcoming document production project
09/28/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondence with US Legal re re-scheduling depositions.
09/28/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondence with Ringtail administers re document production.
09/28/2020	Brian D. Kouassi	BDK	0.8	\$325.00	\$260.00	Prepare zip of documents for client's review and send to client
09/28/2020	Brian D. Kouassi	BDK	1.5	\$325.00	\$487.50	Pull and create exhibits of job descriptions from Adam Lief's.
09/28/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Draft correspondence to BXK regarding binders and FTP to client
09/28/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from client regarding depo prep and Oct 2 30b6 depo objectives
09/28/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to BK regarding document prep status.
09/28/2020	Shira Gelfand	SZG	0.9	\$425.00	\$382.50	Correspondence with client re Adam Lief deposition information (.6); Paralegal correspondence re production to client (.3).
09/29/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re potential exhibits.
09/29/2020	Brian D. Kouassi	BDK	2.4	\$325.00	\$780.00	Pull documents for CEG's review of relevant documents.
09/29/2020	Brian D. Kouassi	BDK	0.8	\$325.00	\$260.00	Send documents to outside printing company for upcoming deposition binders
09/29/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with printing company re upcoming print job
09/29/2020	Brian D. Kouassi	BDK	0.7	\$325.00	\$227.50	Correspondence with printing company re upcoming print job and resend documents to company
09/29/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Update docket folders with recent filings.
09/29/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review file, opposing counsel correspondence regarding proposed schedule and draft correspondence to CEG/SZG regarding same.
09/29/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Review interrogatory responses and note deficiencies.
09/29/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Draft correspondence to client regarding discovery.
09/29/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Review file and draft correspondence to SZG/CEG regarding deposition scheduling
09/29/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review subpoena.
09/29/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to CEG/SZG regarding subpoena scheduling.
09/29/2020	Maya S. Jumper	MSJ	0.8	\$475.00	\$380.00	Review and revise proposed joint schedule.
09/29/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to opposing counsel regarding finalizing schedule
09/29/2020	Shira Gelfand	SZG	3.3	\$425.00	\$1,402.50	Review of job description data files for deposition exhibit (.8); Correspondence with team (.4) correspondence with counsel (.3); Review filing from Judge Gorenstein (.2); Review BXK binder docs for CEG review (1.2); review proposed scheduling and filing (.4).
09/30/2020	Anna Bostwick	ABX	2.0	\$325.00	\$650.00	Ingest client documents into Nuix; correspondence with team re same.
09/30/2020	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Send documents and video to client re deposition training.
09/30/2020	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Create binder sheets for deposition binders.

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
09/30/2020	Brian D. Kouassi	BDK	2.9	\$325.00	\$942.50	Pull and individualize the job title concerning Adam Lief
09/30/2020	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	USLS InstantExhibit+ Training.
09/30/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins re uploading documents from client
09/30/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins re uploading documents from client
09/30/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins re uploading documents from client
09/30/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Save new document from client in preparation to send to Ringtail
09/30/2020	Cara E. Greene	CEG	5.3	\$950.00	\$5,035.00	Review documents in advance of 30(b)(6) deposition and designate exhibits (2.3); deposition preparation meeting with client, SZG, MSJ (3.0).
09/30/2020	Maya S. Jumper	MSJ	3.0	\$475.00	\$1,425.00	Conduct deposition prep for client.
09/30/2020	Maya S. Jumper	MSJ	1.0	\$475.00	\$475.00	Conference with SZG and US legal regarding deposition logistics.
09/30/2020	Shira Gelfand	SZG	10.5	\$425.00	\$4,462.50	Prepare Adam Lief documents and review, organize for deposition (2.4); Prepare Stuart Breslow documents for deposition (2.7); Attention to Breslow objectives for deposition (.7); Call with client and call with MSJ and CEG, review depo prep materials (2.7); Correspondence with opposing counsel (.4); Call with MSJ (.3); US Legal remote depo demo (.5); deposition coordination with US Legal (.4); Attention to Diane Greene subpoena (.4).
10/01/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with outside printing company re deposition print job
10/01/2020	Brian D. Kouassi	BDK	1.8	\$325.00	\$585.00	Pull documents for upcoming deposition for Stuart Breslow
10/01/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with the printing company re size of print job.
10/01/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Send documents to printing company re deposition binder re Stuart Breslow's deposition
10/01/2020	Brian D. Kouassi	BDK	0.6	\$325.00	\$195.00	Update docket and calender with new deadlines from the court.
10/01/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with printing company re shipment documents to office.
10/01/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Update docket re recent filings.
10/01/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting.
10/01/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Review file and draft correspondence to opposing counsel regarding confidential order
10/01/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review protective order and draft correspondence to SZG regarding correspondence to client
10/01/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review and revise conflict waiver.
10/01/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to CEG/SZH regarding deposition scheduling.
10/01/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to CEG regarding deposition prep and scheduling
10/01/2020	Shira Gelfand	SZG	8.1	\$425.00	\$3,442.50	Coordination of exhibits and preparation for Adam Lief deposition (3.3); Reviewing documents, finalizing Stuart Breslow deposition documents, correspondence with BKK and vendor re binders (2.1); Correspondence with opposing counsel and draft response re AEO designation (.8); Correspondence with vendor and client re videography, review confidentiality agreement re sharing with client (.7); Review court filing re discovery schedule and calendar dates (.7); review edits to conflict waiver (.5).
10/02/2020	Cara E. Greene	CEG	10.8	\$950.00	\$10,260.00	Prepare outline for A. Lief deposition (3.9); take A. Lief deposition (6.9)
10/02/2020	Daniel Stromberg	DXS	0.7	\$875.00	\$612.50	Produce client document per SXG, pdf and email to SXG for deposition (.4); advise team re: loading of manual production document (.1); assess defendant production html file, image and email as pdf to SXG for deposition (.2).
10/02/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to LM/BS regarding subpoena.
10/02/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review rule and revise subpoena.
10/02/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Update file and draft correspondence to CEG/SZG regarding deposition objectives
10/02/2020	Naomi Campusano	NCX	1.0	\$350.00	\$350.00	Ingest client documents in Nuix and email team re same.
10/02/2020	Shira Gelfand	SZG	10.3	\$425.00	\$4,377.50	Preparation of exhibits and outline for deposition (1.7); Attention to bates stamp and production of client document (.8); Correspondence with client re Magnet system and ladder (.5); review client documents from Magnet system (.4); Deposition of Adam Lief (6.0); Prepare list of outstanding tasks for team (.7); Correspondence re subpoena of Diane Greene (.2).
10/05/2020	Cara E. Greene	CEG	3.2	\$950.00	\$3,040.00	Correspondence re deposition dates (.1); edit letter to opposing counsel (.2); review documents for upcoming depositions (2.9).
10/05/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Conference call with SZG regarding next steps and tasks.
10/05/2020	Maya S. Jumper	MSJ	1.4	\$475.00	\$665.00	Review FRCP and prepare subpoena for service.
10/05/2020	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Review docs.
10/05/2020	Shira Gelfand	SZG	6.8	\$425.00	\$2,890.00	Review agenda for team call (.3); Correspondence with MSJ and CEG (.2); correspondence with client (.1); Call with MSJ (.5); draft email to counsel, review of RFP's and responses to Interrogatories (.8); Review of Rough transcript from Adam Lief deposition, begin drafting Kevin Lucas deposition outline (2.3); Review documents in advance of Stuart Breslow deposition (2.2); Correspondence re Diane Green subpoena (.2); Attention to marked deposition exhibits and correspondence with US Legal re same (.3).
10/06/2020	Cara E. Greene	CEG	3.1	\$950.00	\$2,945.00	Revise conflict waiver (.3); case management meeting (.5); review documents related to client's deposition (2.3)
10/06/2020	Maya S. Jumper	MSJ	1.7	\$475.00	\$807.50	Review documents in preparation for Stuart Breslow deposition.
10/06/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence to opposing counsel regarding outstanding discovery.
10/06/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Conference with SZG/CEG regarding next steps.
10/06/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to SL regarding depo scheduling.
10/06/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Revise and circulate agenda.
10/06/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review and finalize subpoena.
10/06/2020	Maya S. Jumper	MSJ	0.8	\$475.00	\$380.00	Review documents.
10/06/2020	Naomi Campusano	NCX	1.0	\$350.00	\$350.00	Import defendant's production into Nuix and email team re same.
10/06/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Correspondence with NXC re extracting HC files.
10/06/2020	Sara Olson	SXO	0.2	\$350.00	\$70.00	Correspondence with RXT re Defendant's production HC file.
10/06/2020	Shira Gelfand	SZG	6.6	\$425.00	\$2,805.00	Correspondence with counsel re discovery and deposition issues (.7); Correspondence with paralegals (.2); Review new production from Google and additional documents from MSJ, compare with existing Breslow-related documents (1.2); Prepare agenda for team (.4); Team meeting (.6); Draft correspondence to opposing counsel re outstanding items, review documents re same (1.4); Correspondence with US Legal re Friday deposition logistics (.4); correspondence with MSJ (.2); Begin review of documents in advance of client deposition call with attention to potential deposition documents (2.3).
10/07/2020	Anna Bostwick	ABX	3.2	\$325.00	\$1,040.00	Import defendant production into Nuix; troubleshoot problems and correspondence with Nuix support re same
10/07/2020	Brian D. Kouassi	BDK	1.4	\$325.00	\$455.00	Download Defendant's production.
10/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins re uploading Defendant's production
10/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re preparation of deposition binders
10/07/2020	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Prepare binders for deposition for Tariq Shaukat.
10/07/2020	Cara E. Greene	CEG	3.3	\$950.00	\$3,135.00	Deposition prep meeting with client and prepare for same.
10/07/2020	Maya S. Jumper	MSJ	2.5	\$475.00	\$1,187.50	Conference wit CEG/SZG and client regarding deposition prep.
10/07/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review file; draft correspondence to SZG regarding document review.
10/07/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from opposing counsel and draft correspondence to SZG regarding case strategy
10/07/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Proof and draft correspondence to opposing counsel regarding subpoena
10/07/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from client regarding case background.
10/07/2020	Shira Gelfand	SZG	9.3	\$425.00	\$3,952.50	Continue reviewing client documents with attention to client deposition (1.2); Client deposition prep session (2.8); Correspondence with counsel (.5); Begin preparing Tariq Shaukat deposition document binder and review documents and objectives (3.4); correspondence with BKK (.2); Review new production from Google, attention to Stuart Breslow documents (.3); correspondence with client re: Breslow points (.2); correspondence with CEG re Breslow deposition logistics (.1); Call with MSJ (.4); review DG subpoena (.2).

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
10/08/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re pulling documents for deposition binders
10/08/2020	Brian D. Kouassi	BDK	1.2	\$325.00	\$390.00	Pull documents for Stuart Breslow's upcoming deposition.
10/08/2020	Brian D. Kouassi	BDK	1.2	\$325.00	\$390.00	Pull documents for printing re Deposition binder for Tariq Shaukat
10/08/2020	Brian D. Kouassi	BDK	0.6	\$325.00	\$195.00	Edit documents pertaining to deposition binders.
10/08/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Draft deposition notice for Brian Stevens.
10/08/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re draft deposition notice.
10/08/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with printing company re request to print deposition binder
10/08/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondence with printing company re print job and send documents pertaining to Tariq Shaukat's deposition
10/08/2020	Cara E. Greene	CEG	6.5	\$950.00	\$6,175.00	Review documents for S. Breslow deposition and prepare deposition outline (4.5); conference with client to prepare for deposition (2.0).
10/08/2020	Daniel Stromberg	DXS	0.2	\$875.00	\$175.00	Advise SXG re: printing and coding options for production renditions in Nuix
10/08/2020	Maya S. Jumper	MSJ	1.5	\$475.00	\$712.50	Conference with CEG/SZG and client regarding deposition preparation.
10/08/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference call with SZG/CEG regarding debrief meeting.
10/08/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to CEG/SZG regarding deposition objectives.
10/08/2020	Maya S. Jumper	MSJ	0.7	\$475.00	\$332.50	Draft correspondence to opposing counsel regarding deposition prep
10/08/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review file and draft correspondence to LM regarding service of subpoena.
10/08/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to BK regarding document prep.
10/08/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review SZG edits to correspondence to opposing counsel.
10/08/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to opposing counsel regarding document production
10/08/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to SZG regarding document review.
10/08/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review correspondence from SZG regarding deposition prep.
10/08/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding deposition prep.
10/08/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review file and draft deposition prep materials.
10/08/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding deposition logistics.
10/08/2020	Shira Gelfand	SZG	9.7	\$425.00	\$4,122.50	Preparation for client call and review of documents, finalize Shaukat documents (1.8) client depo prep and follow-up cal with MSJ and CEG (2.8); Call with MSJ (.3); Correspondence re additional documentation and draft list of relevant individuals for deposition (1.4); Attention to Shaukat documents and binder logistics (.7); Finalize Breslow exhibits, final review and upload to platform (1.6); correspondence with counsel (.7); attention to Brian Stevens deposition notice and Diane Greene subpoena (4).
10/09/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re deposition binder.
10/09/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ and SZG re fixing production to send to printing company
10/09/2020	Brian D. Kouassi	BDK	1.2	\$325.00	\$390.00	Fix production and resend to printing company for printing
10/09/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with printing company re fixing print job
10/09/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Telephone conference with printing company re fixing print job
10/09/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Telephone conference with printing company re fixing print job
10/09/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Upload documents from client and send to Ringtail admin re upload to system
10/09/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins re uploading production
10/09/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Send plaintiff's production to Defendant's counsel.
10/09/2020	Cara E. Greene	CEG	8.3	\$950.00	\$7,885.00	Prepare for and take S. Breslow deposition.
10/09/2020	Maya S. Jumper	MSJ	7.0	\$475.00	\$3,325.00	Second chair deposition of Stuart Breslow.
10/09/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG to client regarding deposition update
10/09/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from BK/SZG regarding document production
10/09/2020	Naomi Campusano	NCX	1.0	\$350.00	\$350.00	Ingest client documents into Nuix and email team re same.
10/09/2020	Naomi Campusano	NCX	1.1	\$350.00	\$385.00	Prepare documents for production and email team re same.
10/09/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Correspondence with SXG re deposition binder preparation.
10/09/2020	Sara Olson	SXO	0.3	\$350.00	\$105.00	Batch print deposition binder documents from Nuix.
10/09/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Circulate deposition binder preparation documents to vendor via FTP
10/09/2020	Sara Olson	SXO	0.4	\$350.00	\$140.00	Correspondence with BDK, MSJ, SXG re deposition preparation.
10/09/2020	Sara Olson	SXO	0.4	\$350.00	\$140.00	Pull and quality check deposition preparation documents
10/09/2020	Sara Olson	SXO	0.6	\$350.00	\$210.00	Correspondence with BDK, MSJ, SXG re deposition preparation.
10/09/2020	Shira Gelfand	SZG	10.7	\$425.00	\$4,547.50	Review additional production and prepare for Breslow deposition (1.7); Deposition of Breslow and debrief with CEG and MSJ (6.6); Prepare list of outstanding tasks for next week (.8); Attention to production to Defendant of client notes (.7); correspondence with US legal re Shaukat deposition (.4); attention to Shaukat binders and correspondence with Sitelogistix re same (.5);.
10/12/2020	Shira Gelfand	SZG	7.1	\$425.00	\$3,017.50	Review of documents, begin preparing documents for Will Grannis deposition (2.8); Begin drafting comprehensive outline, prepare for Shaukat deposition (3.7); attention to deposition transcripts for Lief and Breslow (.3);
10/13/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with US Legal re upcoming depo logistics (.3).
10/13/2020	Brian D. Kouassi	BDK	0.8	\$325.00	\$260.00	Correspondence with SZG re editing excel sheets.
10/13/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Edit excel sheets for attorney's review.
10/13/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re edits to excel sheets for attorney's review.
10/13/2020	Brian D. Kouassi	BDK	0.8	\$325.00	\$260.00	Download transcripts from deposition of Adam Lief.
10/13/2020	Cara E. Greene	CEG	3.9	\$950.00	\$3,705.00	Meeting with client to prepare for deposition and prepare for same (2.3); review case documents (1.6)
10/13/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Conference with SZG regarding case updates and next steps.
10/13/2020	Maya S. Jumper	MSJ	1.2	\$475.00	\$570.00	Review file and update objectives for deposition.
10/13/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review and revise correspondence to opposing counsel regarding discovery issues.
10/13/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Conference with client regarding fact background.
10/13/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference with SZG regarding case update and deposition prep.
10/13/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from SZG and review client timeline.
10/13/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to SZG regarding edits to correspondence with opposing counsel
10/13/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Review file and draft deposition objectives.
10/13/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to LM regarding service update.
10/13/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from LM regarding service of subpoena.
10/13/2020	Shira Gelfand	SZG	6.7	\$425.00	\$2,847.50	Prepare agenda for meeting with MSJ (.3); Call with MSJ (.3); Draft correspondence to opposing counsel (.8); Prep for client call (.3); Call with client (2.0); Edit correspondence to counsel (.4); correspondence re depo logistics (.6); Begin drafting Kevin Lucas Outline (2.1).
10/14/2020	Anna Bostwick	ABX	1.9	\$325.00	\$617.50	Import defendant production into Nuix.
10/14/2020	Brian D. Kouassi	BDK	1.5	\$325.00	\$487.50	Download Defendant's production.
10/14/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admin re uploading Defendant's production
10/14/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins re Defendant's production
10/14/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re saved transcripts.
10/14/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Update weekly agenda for upcoming Inside Sales meeting.
10/14/2020	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Prepare binder for upcoming deposition of Will Grannis
10/14/2020	Brian D. Kouassi	BDK	0.6	\$325.00	\$195.00	Prepare binder for deposition of Bernita Johnson
10/14/2020	Brian D. Kouassi	BDK	0.6	\$325.00	\$195.00	Create index of documents pulled for Traiq's depositions.

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Case No. 19-cv-08655 (JHR)
Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
10/14/2020	Cara E. Greene	CEG	13.2	\$950.00	\$12,540.00	Defend U. Rowe deposition (9.0); review documents and draft T. Shaukat deposition outline (4.2)
10/14/2020	Daniel Stromberg	DXS	0.2	\$875.00	\$175.00	Advise SXG re: reporting of document metadata from Nuix.
10/14/2020	Maya S. Jumper	MSJ	6.6	\$475.00	\$3,135.00	Deposition of Ulku Rowe.
10/14/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Conference with CDY/client post depo.
10/14/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Prep for client depo.
10/14/2020	Maya S. Jumper	MSJ	2.0	\$475.00	\$950.00	Review rough transcript and update outline.
10/14/2020	Maya S. Jumper	MSJ	1.0	\$475.00	\$475.00	Upload docs for depo.
10/14/2020	Shira Gelfand	SZG	10.5	\$425.00	\$4,462.50	Correspondence with counsel, initial review of new production of documents (1.7); Correspondence re depo logistics (.4); Continue drafting Kevin Lucas outline, review of documents re same (3.4); Review of documents for Will Grannis deposition binder and outline (2.7); Prep for Tariq Shaukat deposition (2.3).
10/15/2020	Brian D. Kouassi	BDK	1.3	\$325.00	\$422.50	Create PDF portfolio of recent productions from the Defendant's.
10/15/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re defendant's production.
10/15/2020	Brian D. Kouassi	BDK	3.6	\$325.00	\$1,170.00	Pull job descriptions for potential exhibits.
10/15/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re potential exhibits.
10/15/2020	Cara E. Greene	CEG	11.0	\$950.00	\$10,450.00	Prepare for deposition of T. Shaukat (2.5); take deposition of T. Shaukat (8.0); conference with MSJ, SZG, client re deposition (.5).
10/15/2020	Maya S. Jumper	MSJ	8.0	\$475.00	\$3,800.00	Deposition of Tarim Shaukat.
10/15/2020	Shira Gelfand	SZG	10.6	\$425.00	\$4,505.00	Prep for deposition (1.6); Deposition of Tariq Shaukat, debrief with CEG and MSJ, call with client (9.0);
10/16/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re preparation of exhibits for upcoming depositions
10/16/2020	Brian D. Kouassi	BDK	3.9	\$325.00	\$1,267.50	Prepare and pull exhibits for upcoming depositions.
10/16/2020	Maya S. Jumper	MSJ	1.3	\$475.00	\$617.50	Document review.
10/16/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with SZG regarding case updates and deposition prep.
10/16/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding document review.
10/16/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from LM regarding subpoena service.
10/16/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from opposing counsel regarding deposition logistics and draft correspondence to CEG/SZG with draft response.
10/16/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG regarding doc review.
10/16/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to SZG regarding draft correspondence to opposing counsel and next steps in doc review
10/16/2020	Maya S. Jumper	MSJ	1.5	\$475.00	\$712.50	Review file and draft deficiency letter.
10/16/2020	Shira Gelfand	SZG	9.3	\$425.00	\$3,952.50	Call with MSJ (.5); Prepare list of tasks (.3); Review production for outstanding documents from counsel (.8); Review of documents for Kevin Lucas and Will Grannis deposition binders, correspondence with BKK re binders (4.7); Correspondence with BKK re job descriptions (.2); Continue drafting Kevin Lucas outline, send to MSJ (.7); Correspondence with US Legal re upcoming depositions (.4); correspondence with court reporter re exhibits from Shaukat deposition, QC transcript (1.1); Correspondence with counsel (.4); Correspondence re Diane Greene service of process (.2).
10/17/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review deposition objectives from SZG.
10/17/2020	Shira Gelfand	SZG	3.4	\$425.00	\$1,445.00	Correspondence with court reporter re deposition exhibits and review transcript (.7); begin drafting will grannis objectives and review of docs re same (2.7).
10/18/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Schedule deposition prep with CEG.
10/19/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SXO re ringtial issues.
10/19/2020	Brian D. Kouassi	BDK	5.5	\$325.00	\$1,787.50	Prepare deposition binders for Kevin Lucas and Will Grannis to be sent out for printing
10/19/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with printing company re deposition binders
10/19/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with printing company re deposition binders
10/19/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with printing company re deposition binders
10/19/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re deposition binders.
10/19/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re plaintiff's documents.
10/19/2020	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Produce plaintiff documents for review before final production
10/19/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting (.5).
10/19/2020	Daniel Stromberg	DXS	1.5	\$875.00	\$1,312.50	Advise BDK re: printing and coding options for production renditions in Nuix (.2); assess unproduced relevant client documents, thread emails, assess threads of produced documents, assemble potential production population, and advise MSJ (1.3).
10/19/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review file and draft agenda for team call.
10/19/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with CEG regarding regarding case updates and M&C.
10/19/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Review file and draft correspondence to opposing counsel regarding scheduling and M&C
10/19/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review documents for production.
10/19/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review file and draft correspondence to CEG regarding case updates.
10/19/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Prepare for M&C.
10/19/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with opposing counsel regarding discovery and next steps.
10/19/2020	Maya S. Jumper	MSJ	3.7	\$475.00	\$1,757.50	Doc review and depo prep.
10/20/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with printing company re FedEx label.
10/20/2020	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Prepare documents for upcoming production.
10/20/2020	Brian D. Kouassi	BDK	3.6	\$325.00	\$1,170.00	Prepare deposition binder for Will Grannis's upcoming deposition
10/20/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Send deposition documents to printing company.
10/20/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Pull work experience of witness for upcoming deposition.
10/20/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with printing company re another deposition binder printing request
10/20/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Correspondence re document production, deposition, letter to opposing counsel
10/20/2020	Daniel Stromberg	DXS	0.3	\$875.00	\$262.50	Advise MSJ and BDK re: client email potential production population
10/20/2020	Maya S. Jumper	MSJ	7.1	\$475.00	\$3,372.50	Doc review and deposition prep.
10/20/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Draft correspondence to BK regarding document production.
10/20/2020	Maya S. Jumper	MSJ	3.6	\$475.00	\$1,710.00	Review documents and depo prep.
10/21/2020	Brian D. Kouassi	BDK	5.4	\$325.00	\$1,755.00	Prepare and compile documents for Bernita Jamison deposition for printing company
10/21/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re deposition binders.
10/21/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re deposition binders.
10/21/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re deposition binders.
10/21/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with printing company re deposition binders
10/21/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with printing company re deposition binders
10/21/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Phone conference with printing company re deposition binders
10/21/2020	Cara E. Greene	CEG	3.1	\$950.00	\$2,945.00	Correspondence re AEO designations, depositions (.2); review B. Jamison outline and documents (1.3); review case documents in advance of depositions (1.6).
10/21/2020	Daniel Stromberg	DXS	0.5	\$875.00	\$437.50	Advise BDK re: Nuix bindering and printing deposition documents
10/21/2020	Maya S. Jumper	MSJ	7.2	\$475.00	\$3,420.00	Depo prep.
10/21/2020	Sara Olson	SXO	0.2	\$350.00	\$70.00	Correspondence with vendor re physical binder questions re preparation for deposition
10/21/2020	Sara Olson	SXO	0.2	\$350.00	\$70.00	Zip deposition binder documents for FTP to vendor.
10/21/2020	Sara Olson	SXO	0.3	\$350.00	\$105.00	Draft correspondence re request to vendor re physical deposition binder preparation
10/21/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Correspondence with BDK re deposition physical binder preparation
10/21/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Send physical binder request to vendor.

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
10/22/2020	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Deposition training for Bernita Jamison's deposition.
10/22/2020	Brian D. Kouassi	BDK	0.7	\$325.00	\$227.50	Prepare and compile documents to uploading on Ringtail
10/22/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail re uploading documents.
10/22/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Phone conference with MSJ re preparation for upcoming deposition tomorrow
10/22/2020	Brian D. Kouassi	BDK	2.0	\$325.00	\$650.00	Extract job descriptions for upcoming deposition for Kevin Lucas
10/22/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Send production to opposing counsel.
10/22/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Send out reminder regarding upcoming Pre-Motion notice.
10/22/2020	Cara E. Greene	CEG	1.3	\$950.00	\$1,235.00	Conference with MSJ re B. Jamison deposition (1.2); correspondence with MSJ re production (1.1)
10/22/2020	Daniel Stromberg	DXS	0.7	\$875.00	\$612.50	Videoconference Nuix training for BDK re: binding and printing deposition documents
10/22/2020	Daniel Stromberg	DXS	0.3	\$875.00	\$262.50	Coordinate client document Nuix ingestion and production, advise BDK re: timeline
10/22/2020	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Conference with CEG regarding deposition prep.
10/22/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Conference with BK regarding deposition prep.
10/22/2020	Maya S. Jumper	MSJ	4.5	\$475.00	\$2,137.50	Review file; prepare for deposition.
10/22/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from BK regarding deposition logistics.
10/22/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from opposing counsel regarding deposition logistics
10/22/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to SZG regarding additions to agenda.
10/22/2020	Naomi Campusano	NCX	0.8	\$350.00	\$280.00	Ingest client documents into Nuix and email team re same.
10/22/2020	Naomi Campusano	NCX	1.0	\$350.00	\$350.00	Prepare documents for production and email team re same.
10/23/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re preparation for deposition of Bernita Jamison
10/23/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Phone conference with MSJ re preparation for upcoming deposition
10/23/2020	Brian D. Kouassi	BDK	3.8	\$325.00	\$1,235.00	Deposition of Bernita Jamison.
10/23/2020	Cara E. Greene	CEG	4.8	\$950.00	\$4,560.00	Prepare for and attend B. Jamison deposition.
10/23/2020	Maya S. Jumper	MSJ	0.7	\$237.50	\$166.25	Travel to office for depo.
10/23/2020	Maya S. Jumper	MSJ	4.0	\$475.00	\$1,900.00	Conduct deposition of Bernita Jamison.
10/23/2020	Maya S. Jumper	MSJ	3.5	\$475.00	\$1,662.50	Prepare for deposition of Bernita Jamison.
10/23/2020	Naomi Campusano	NCX	1.0	\$350.00	\$350.00	Prepare documents for production in Nuix.
10/25/2020	Shira Gelfand	SZG	1.2	\$425.00	\$510.00	Review week of correspondence (.4); review referenced documents in opposing counsel correspondence (.8)
10/26/2020	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Edit and expand exhibit format for court reporter.
10/26/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re assisting court reporter with exhibits.
10/26/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with court reporter re exhibits.
10/26/2020	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Download defendant's production for uploading to Ringtail
10/26/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail re uploading defendant's production
10/26/2020	Brian D. Kouassi	BDK	0.9	\$325.00	\$292.50	Coding of multiple documents.
10/26/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re coding relevant documents.
10/26/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins re creating plaintiff's production
10/26/2020	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Update exhibit list re Kevin Lucas and Will Grannis.
10/26/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting.
10/26/2020	Cara E. Greene	CEG	5.9	\$950.00	\$5,605.00	Prepare outline for K. Lucas deposition and review related documents
10/26/2020	Daniel Stromberg	DXS	0.1	\$875.00	\$87.50	Conference with MSJ re: client email review population re: email threading
10/26/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review file and revise agenda.
10/26/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Conference with CEG/SZG regarding.
10/26/2020	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Document review and redaction.
10/26/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Conference call with DXS regarding discovery production.
10/26/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference call with SZG regarding tasks and next steps.
10/26/2020	Maya S. Jumper	MSJ	2.4	\$475.00	\$1,140.00	Draft deficiency letter.
10/26/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to BK regarding redactions.
10/26/2020	Shira Gelfand	SZG	6.2	\$425.00	\$2,635.00	Prep for team meeting, prepare agenda (.8); team meeting (.7); Call with MSJ (.3); review of documents referenced in opposing counsel correspondence, cross check with Kevin Lucas depo binder (.4); Review of new production, add to KL depo binder (1.2); correspondence with US legal re deposition logistics (.2); correspondence with BDK re index, review index and marked exhibits (.5); correspondence with opposing counsel (.2); Prep for tomorrow's deposition, review of documents and correspondence and outline (1.3); correspondence re plaintiff production and review of documents in production (1.1).
10/27/2020	Cara E. Greene	CEG	8.3	\$950.00	\$7,885.00	Finishing preparing for K. Lucas deposition and take same.
10/27/2020	Daniel Stromberg	DXS	0.1	\$875.00	\$87.50	Advise NCX re: options for MSJ review of client production volume
10/27/2020	Maya S. Jumper	MSJ	6.1	\$475.00	\$2,897.50	Attend deposition of Kevin Lucas.
10/27/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Prepare for deposition of Kevin Lucas.
10/27/2020	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Prepare and review production.
10/27/2020	Naomi Campusano	NCX	1.5	\$350.00	\$525.00	Prepare documents for production in Nuix.
10/27/2020	Shira Gelfand	SZG	11.4	\$425.00	\$4,845.00	Prepare for deposition (3.4); Deposition of Kevin Lucas (7.9); correspondence with client (.1)
10/28/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re upcoming production.
10/28/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re updating exhibits list to Will Grannis's index.
10/28/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re sending court reporter PDF versions of exhibits.
10/28/2020	Brian D. Kouassi	BDK	0.8	\$325.00	\$260.00	Prepare exhibits in PDF format for court reporter.
10/28/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with court reporter re exhibits.
10/28/2020	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Daily pod meeting.
10/28/2020	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Phone conference with NXC re ringtail issues with production.
10/28/2020	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Edits and redactions to plaintiff's production.
10/28/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Save deposition transcripts.
10/28/2020	Brian D. Kouassi	BDK	3.3	\$325.00	\$1,072.50	Compile, review, and revise Plaintiff's production.
10/28/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Defendant's counsel re production.
10/28/2020	Brian D. Kouassi	BDK	0.8	\$325.00	\$260.00	Update deposition binders with new exhibit numbers.
10/28/2020	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Review correspondence to client.
10/28/2020	Cara E. Greene	CEG	3.7	\$950.00	\$3,515.00	Prepare for W. Grannis deposition and review related documents.
10/28/2020	Daniel Stromberg	DXS	0.3	\$875.00	\$262.50	Advise SXG re: review and printing of client production renditions
10/28/2020	Maya S. Jumper	MSJ	0.7	\$475.00	\$332.50	Review file and draft production cover letter.
10/28/2020	Maya S. Jumper	MSJ	1.3	\$475.00	\$617.50	Review and coordinate production.
10/28/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG and revise.
10/28/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to SZG regarding document production.
10/28/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Draft cover letter to document production; draft correspondence to CEG/SZG regarding same
10/28/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to BK regarding document production.
10/28/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review correspondence from SZG/BK regarding document production
10/28/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review file and correspondence from DXS; draft correspondence to BK/SZG regarding same
10/28/2020	Naomi Campusano	NCX	3.5	\$350.00	\$1,225.00	Prepare plaintiff's production in Nuix and email team re same
10/28/2020	Naomi Campusano	NCX	0.5	\$350.00	\$175.00	Video conference with BDK re plaintiff's production
10/28/2020	Naomi Campusano	NCX	0.7	\$350.00	\$245.00	Ingest client document into Nuix and email team re same.

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
10/28/2020	Shira Gelfand	SZG	4.5	\$425.00	\$1,912.50	Correspondence with US Legal re depo logistics (.2); Correspondence with BXK re Grannis documents (.6); Correspondence with Nuix team re documents with Bates stamp (.2); attention to Plaintiff production and review of cover letter (.4); Review of correspondence and production from Google (1.1); Prep for Will Grannis deposition, review of documents (1.6); Correspondence with client (.4).
10/29/2020	Brian D. Kouassi	BDK	1.5	\$325.00	\$487.50	Create Master Exhibits index re depositions.
10/29/2020	Brian D. Kouassi	BDK	3.0	\$325.00	\$975.00	Make edits to Master Exhibits List.
10/29/2020	Cara E. Greene	CEG	10.2	\$950.00	\$9,690.00	Finish preparing for and take deposition of W. Grannis.
10/29/2020	Maya S. Jumper	MSJ	6.5	\$475.00	\$3,087.50	Second chair deposition of Will Grannis.
10/29/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with SZG regarding debrief and next steps.
10/29/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review deposition outline.
10/29/2020	Shira Gelfand	SZG	10.0	\$425.00	\$4,250.00	Depo prep for Grannis (2.6); Deposition of Will Grannis (6.3); Call with client, debrief with team (.6); Call with MSJ (.5).
10/30/2020	Anna Bostwick	ABX	0.5	\$325.00	\$162.50	Begin importing defendant production; correspondence with BXK re problems with import
10/30/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins re uploading Defendant's production
10/30/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Phone conference with SiteLogistix re outstanding invoices.
10/30/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with accounting re outstanding invoices for SiteLogistix.
10/30/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with accounting re outstanding invoices for SiteLogistix.
10/30/2020	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Telephone call with K. Gage re settlement.
10/30/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with BS/SZG regarding lit support plan and next steps.
10/30/2020	Shira Gelfand	SZG	4.2	\$425.00	\$1,785.00	Continue reviewing documents in advance of Burdis and Stevens deposition (2.7); Correspondence with CEG and MSJ (.1); Correspondence with US legal re depo exhibits and upcoming depositions (.3); Correspondence with client (.2); call with BXS re additional para staffing (.4); attention to vendor invoices (.2); Correspondence with Nuix team re production and bates (.3).
11/02/2020	Brian D. Kouassi	BDK	2.4	\$325.00	\$780.00	Prepare binder of marked exhibits prepare new exhibits.
11/02/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Telephone call with client and prepare for same.
11/02/2020	Shira Gelfand	SZG	8.1	\$425.00	\$3,442.50	Correspondence with CEG and MSJ (.3); Prep for call with client, review settlement discussion in mediation statement (.3); Call with client (.4); Correspondence with paralegal re outstanding tasks (.4); Document review with attention to two upcoming depositions (3.8); Begin drafting deposition objectives for Jenny Burdis, review transcripts of previous depositions and interrogatory responses (2.7); correspondence with opposing counsel (.2).
11/03/2020	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence with opposing counsel re negotiations.
11/03/2020	Shira Gelfand	SZG	5.5	\$425.00	\$2,337.50	Correspondence with CEG and MSJ re settlement negotiation (.2); correspondence with opposing counsel re deposition logistics (.2); correspondence with US Legal re upcoming depositions (.3); Correspondence with BXK re assignments (.3); Continue review of Brian Stevens documents and draft objectives (3.8); Review marked exhibit index and binder for print (.7).
11/04/2020	Brian D. Kouassi	BDK	6.9	\$325.00	\$2,242.50	Prepare deposition binders.
11/04/2020	Shira Gelfand	SZG	3.2	\$425.00	\$1,360.00	Correspondence with paralegal re outstanding tasks and review binders (.4); Review of documents to prepare for Stuart Vardaman deposition binder for CEG review (2.6); correspondence with counsel (.2);.
11/05/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail re uploading Defendant's production
11/05/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Download transcript of Bernita Jamison's Deposition.
11/05/2020	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Phone conference with MXD and RXT re coverage during BDK's PTO.
11/05/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Phone conference with SZG re deposition binders.
11/05/2020	Brian D. Kouassi	BDK	8.2	\$325.00	\$2,665.00	Compile documents for Deposition Binders upcoming Deposition for Jennifer Burdis and Brian Stevens
11/05/2020	Michaela Dougherty	MDX	0.7	\$350.00	\$245.00	Conference with BDK and RXT re deposition preparations, binders
11/05/2020	Naomi Campusano	NCX	1.0	\$350.00	\$350.00	Import defendant's production into Nuix and email team re same.
11/05/2020	Shira Gelfand	SZG	6.4	\$425.00	\$2,720.00	Correspondence with counsel (.2); continue review of documents for Stuart Vardaman deposition, review of deposition binders, mark AEO documents (3.7); correspondence with BXK (.2); begin review of Defendant's new production (2.3).
11/06/2020	Daniel Stromberg	DXS	0.1	\$875.00	\$87.50	Advise MSJ re: TKQ availability re: deposition digests.
11/06/2020	Shira Gelfand	SZG	4.8	\$425.00	\$2,040.00	Correspondence with SiteLogistix (.4); Continue document review (2.7); Edit and draft objectives for Burdis and Stevens depositions, review of deposition documents (1.6); correspondence from client (.1).
11/09/2020	Cara E. Greene	CEG	1.5	\$950.00	\$1,425.00	Prepare for J. Burdis deposition.
11/09/2020	Michaela Dougherty	MDX	0.4	\$350.00	\$140.00	E-mail correspondence with SZG re deposition preparation binders and transcripts; download transcripts re W. Grannis deposition.
11/09/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to TXQ regarding depo digest.
11/09/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with CEG/SZG regarding case updates and next steps.
11/09/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with SZG regarding deposition prep and check-in.
11/09/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Draft correspondence to TXQ with rough transcripts for deposition digests
11/09/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from opposing counsel regarding extension of deposition deadline
11/09/2020	Shira Gelfand	SZG	3.7	\$425.00	\$1,572.50	Call with MSJ (.3); Prepare agenda for team meeting with outstanding tasks (.6); Review documents and production with attention to deficiency ltr (.8); Prep for Burdis deposition, attention to binders (1.4); correspondence with counsel (.3); correspondence with client (.1); review statute cited from D re sworn declarations (.2).
11/10/2020	Michaela Dougherty	MDX	0.1	\$350.00	\$35.00	Download Defendant's document production.
11/10/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to TXQ regarding deposition digests and next steps.
11/10/2020	Shira Gelfand	SZG	2.5	\$425.00	\$1,062.50	Review of Vardaman documents and depo prep (1.7); correspondence with counsel (.1); correspondence with client (.1); Review erratas (.4); correspondence with US Legal re depo logistics (.2).
11/10/2020	Tara K. Quaglione	TKQ	4.5	\$450.00	\$2,025.00	Review Tariq Shaukat deposition and prepare memorandum regarding same.
11/11/2020	Michaela Dougherty	MDX	1.5	\$350.00	\$525.00	E-mail correspondence with SZG re deposition preparation binders; pull documents from nuix; prepare binder materials.
11/11/2020	Naomi Campusano	NCX	1.3	\$350.00	\$455.00	Import defendant's production into Nuix and email team re same.
11/11/2020	Shira Gelfand	SZG	2.6	\$425.00	\$1,105.00	Draft Stuart Vardaman objectives/bio, review docs in preparation for deposition (2.1); Review Defendant production (.2); attention to binders (.3).
11/11/2020	Tara K. Quaglione	TKQ	5.7	\$450.00	\$2,565.00	Review Tariq Shaukat deposition and prepare memorandum regarding same.
11/12/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to opposing counsel regarding deposition scheduling and next steps
11/12/2020	Shira Gelfand	SZG	2.1	\$425.00	\$892.50	Correspondence with counsel (.2); correspondence with client (.1); Prep for Stevens depo, review of documents (1.8).
11/12/2020	Tara K. Quaglione	TKQ	4.0	\$450.00	\$1,800.00	Review Tariq Shaukat deposition and prepare memorandum regarding same.
11/13/2020	Cara E. Greene	CEG	7.5	\$950.00	\$7,125.00	Prepare for and take deposition of B. Stevens (7.2); Telephone call with opposing counsel (.3)
11/13/2020	Maya S. Jumper	MSJ	5.1	\$475.00	\$2,422.50	Second chair deposition of Brian Stevens.
11/13/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to opposing counsel regarding deponent representation
11/13/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to BK regarding calendaring.
11/13/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to opposing counsel regarding conference logistics and scheduling
11/13/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from SZG regarding next steps and schedule call.
11/13/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to TXQ regarding case updates.
11/13/2020	Shira Gelfand	SZG	8.9	\$425.00	\$3,782.50	Depo prep (1.6); Depo of Brian Stevens (2.8); debrief with CEG and MSJ (.8); Call with counsel (.2); call with MSJ (.4); Begin research, review file, and drafting letter to opposing counsel re comparator information (3.6); correspondence with client (.3).

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Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
11/13/2020	Tara K. Quaglion	TKQ	7.0	\$450.00	\$3,150.00	Review Tariq Shaukat and Ulku Rowe depositions and prepare memorandum regarding same
11/14/2020	Shira Gelfand	SZG	2.2	\$425.00	\$935.00	Continue drafting letter re comparators, conduct research and review deposition transcript
11/14/2020	Tara K. Quaglion	TKQ	5.0	\$450.00	\$2,250.00	Review Ulku Rowe deposition and prepare memorandum regarding same.
11/15/2020	Shira Gelfand	SZG	6.7	\$425.00	\$2,847.50	Continue review of depo transcripts, research, and drafting letter re additional comparators (4.6); review of documents and pull for Diane Greene depo binder (2.1).
11/15/2020	Tara K. Quaglion	TKQ	11.0	\$450.00	\$4,950.00	Review Ulku Rowe and Will Grannis depositions, and prepare memorandum regarding same
11/16/2020	Anna Bostwick	ABX	0.2	\$325.00	\$65.00	Add exhibit number field in Nuix.
11/16/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Download deposition transcript Kevin Lucas.
11/16/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MXD re scheduling meeting re deposition binders.
11/16/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re deposition binders.
11/16/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re Pre-Motion notice.
11/16/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Schedule meeting with MDX re deposition binders.
11/16/2020	Brian D. Kouassi	BDK	1.3	\$325.00	\$422.50	Prepare deposition binder re Diane Greene.
11/16/2020	Brian D. Kouassi	BDK	1.3	\$325.00	\$422.50	Video conference with MDX re deposition binders.
11/16/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with U.S. Legal re adding MDX to gain access to deposition documents.
11/16/2020	Cara E. Greene	CEG	3.2	\$950.00	\$3,040.00	Case management meeting with SZG, MSJ (.5); review documents in preparation for S. Vardaman deposition (2.7)
11/16/2020	Daniel Stromberg	DXS	0.1	\$875.00	\$87.50	Advise re: exhibit number coding field and coordinate update of coding template
11/16/2020	Michaela Dougherty	MDX	1.4	\$350.00	\$490.00	Conference with BNK re deposition preparation re deponent D. Greene.
11/16/2020	Michaela Dougherty	MDX	0.3	\$350.00	\$105.00	Update task list re D. Greene deposition preparation; e-mail correspondence with BDK re tasks
11/16/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft follow up correspondence to TXQ regarding deposition digests.
11/16/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to CEG regarding deposition binders.
11/16/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft follow up correspondence to TXQ regarding deposition digest questions
11/16/2020	Shira Gelfand	SZG	8.5	\$425.00	\$3,612.50	Continue drafting letter re additional comparator information, conduct research and review of documents (3.6); Prepare agenda for team meeting (.4); Case management meeting (.3); call with MSJ (.4); attention to Diane Greene binders (.3); correspondence with counsel and review confidential designations in lief transcript (.8); Begin review of documents and drafting EP claim chart (1.1); Correspondence with US Legal re depo logistics (.2); Review documents and prep for Vardaman depo (1.4).
11/16/2020	Tara K. Quaglion	TKQ	8.0	\$450.00	\$3,600.00	Review Will Grannis deposition and prepare memorandum regarding same.
11/17/2020	Anna Bostwick	ABX	0.3	\$325.00	\$97.50	Correspondence with NCX re coding fields in Nuix.
11/17/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with US Legal re depositions and giving MDX access to deposition documents.
11/17/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re deposition transcripts.
11/17/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Save deposition transcripts to iManage.
11/17/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins re production issues.
11/17/2020	Brian D. Kouassi	BDK	1.7	\$325.00	\$552.50	Pull and compile documents re Diane Greene deposition binder
11/17/2020	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Update deposition binder and marked exhibits binder.
11/17/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Update Marked Exhibit index.
11/17/2020	Brian D. Kouassi	BDK	2.9	\$325.00	\$942.50	Finalize D. Greene's deposition binder.
11/17/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re pulling case documents.
11/17/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Pull documents from NUIX pertaining to depositions.
11/17/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Saved documents to the Y-Drive re depositions documents.
11/17/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re saving deposition documents.
11/17/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with JXL re creating ECF account.
11/17/2020	Cara E. Greene	CEG	9.3	\$950.00	\$8,835.00	Finish preparing for and take deposition of S. Vardaman (9.1); review letter to client (.2)
11/17/2020	Daniel Stromberg	DXS	0.5	\$875.00	\$437.50	Assess missing defendant production document images in Nuix; advise re: reproductions and batch print; coordinate upload of images and text to Nuix.
11/17/2020	Michaela Dougherty	MDX	4.0	\$350.00	\$1,400.00	Prepare deposition preparation binder materials and indexes; e-mail correspondence with BDK and SZG
11/17/2020	Maya S. Jumper	MSJ	5.0	\$475.00	\$2,375.00	Second chair deposition of Stuart Vardaman.
11/17/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review file; draft correspondence CEG regarding deposition review.
11/17/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review and draft correspondence to SZG regarding revisions to client correspondence
11/17/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to SZG regarding deposition review.
11/17/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence to BK regarding privilege log.
11/17/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding client correspondence.
11/17/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG regarding comparator analysis document.
11/17/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG/CEG regarding deposition update to client.
11/17/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from client regarding case background and scheduling
11/17/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding deposition strategy.
11/17/2020	Naomi Campusano	NCX	0.4	\$350.00	\$140.00	Obtain documents from case file and email BDK re same.
11/17/2020	Naomi Campusano	NCX	0.6	\$350.00	\$210.00	Import client document into Nuix.
11/17/2020	Naomi Campusano	NCX	0.2	\$350.00	\$70.00	Meeting with MDX re exhibit number field in Nuix.
11/17/2020	Shira Gelfand	SZG	11.2	\$425.00	\$4,760.00	Prep for Vardaman depo (1.7); Deposition of Stuart Vardaman (4.9); Draft correspondence to client re depo (.7); Review declaration from opposing counsel, draft thoughts to CEG and MSJ (1.6); Continue drafting EP claim memo (2.8); correspondence with paralegals re DG binders (.2).
11/17/2020	Tara K. Quaglion	TKQ	4.0	\$450.00	\$1,800.00	Review Adam Lief deposition and prepare memorandum regarding same.
11/18/2020	Brian D. Kouassi	BDK	3.2	\$325.00	\$1,040.00	Compile documents for attorney's review.
11/18/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins re document production issues.
11/18/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins re document production issues.
11/18/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins re document production issues.
11/18/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins re document production issues.
11/18/2020	Daniel Stromberg	DXS	0.3	\$875.00	\$262.50	Assess missing defendant production document images in Nuix; advise re: reproductions.
11/18/2020	Shira Gelfand	SZG	5.8	\$425.00	\$2,465.00	Review UR depo transcript for errata until page 246 (3.1); Correspondence with MSJ re document and depositions (.3); Continue research, review of documents and depo transcripts, continue drafting letter to Google re additional comparator information (2.2) Correspondence with MSJ re letter and additional items (.2).
11/18/2020	Tara K. Quaglion	TKQ	6.5	\$450.00	\$2,925.00	Review Adam Lief deposition and prepare memorandum regarding same.
11/19/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MDX re updating exhibit fields.
11/19/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MDX re updating Nuix.
11/19/2020	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Translate documents from Turkish to English.
11/19/2020	Cara E. Greene	CEG	0.8	\$950.00	\$760.00	Correspondence with opposing counsel re D. Greene deposition (.3); case management meeting with MSJ, SZG (.5)
11/19/2020	Michaela Dougherty	MDX	2.0	\$350.00	\$700.00	Pull documents for deposition preparation binder; draft binder index; e-mail correspondence with BDK re tasks
11/19/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conf call with CEG/SZG regarding case updates and next steps.
11/19/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to TXQ regarding deposition digests.
11/19/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Draft correspondence to opposing counsel regarding deposition of Diane Greene
11/19/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding document review.

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Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
						Review Diane Greene binder before FTP to vendor (.2); Continue research on EP claims and job titles, review job descriptions for comparator letter (2.8); Prepare agenda for team meeting (.5); Case management meeting (.6); Prepare agenda for client call (.2); Attention to conflict waiver (.2); Client meeting (.7); Begin Kevin Lucas depo digest (1.6); Correspondence with counsel and team re DG deposition (.6); correspondence with paralegals re binders and assignments (.4); Review documents for Brian Wilson and Evren Eryurek deposition, pull for binder (2.6); Attention to equal pay memo, review Stevens deposition and additional documents (1.2).
11/19/2020	Shira Gelfand	SZG	9.4	\$425.00	\$3,995.00	
11/19/2020	Tara K. Quaglion	TKQ	5.6	\$450.00	\$2,520.00	Review Stuart Breslow deposition and prepare memorandum regarding same.
11/20/2020	Brian D. Kouassi	BDK	0.8	\$325.00	\$260.00	Draft and compile documents for the deposition binders of B. Wilson's and E. Eryurek's
11/20/2020	Brian D. Kouassi	BDK	2.1	\$325.00	\$682.50	Compile documents re deposition binder for Ben Wilson
11/20/2020	Brian D. Kouassi	BDK	3.1	\$325.00	\$1,007.50	Update Nuix with Exhibit Fields re exhibits from depositions.
11/20/2020	Michaela Dougherty	MDX	1.0	\$350.00	\$350.00	Conference with BDK re updating exhibit number fields in Nuix and preparing binder index from report
11/20/2020	Michaela Dougherty	MDX	3.0	\$350.00	\$1,050.00	Update marked exhibit number fields on Nuix; finalize binder materials; update index; e-mail correspondence with BDK re deposition preparation tasks.
11/20/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from opposing counsel and draft response regarding deposition
11/20/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Draft correspondence to opposing counsel regarding deposition and protective order
						Continue drafting Lucas depo digest (2.1); Correspondence with US Legal re DG depo logistics (.3); Correspondence with counsel (.4); correspondence with MSI (.2); correspondence with BXK re binders and Rowe assignment (.3).
11/20/2020	Shira Gelfand	SZG	3.3	\$425.00	\$1,402.50	
11/20/2020	Tara K. Quaglion	TKQ	5.0	\$450.00	\$2,250.00	Review Stuart Breslow deposition and prepare memorandum regarding same.
11/22/2020	Shira Gelfand	SZG	1.9	\$425.00	\$807.50	Continue drafting objectives for Jenny Burdis depo (.6); continue Kevin Lucas depo digest (1.3)
11/23/2020	Daniel Stromberg	DXS	0.2	\$875.00	\$175.00	Advise BDK re: defendant reproduction technical issues.
11/23/2020	Michaela Dougherty	MDX	1.0	\$350.00	\$350.00	Review client documents re source documents for replacement attachments; e-mail correspondence with DXS and SZG.
11/23/2020	Michaela Dougherty	MDX	3.5	\$350.00	\$1,225.00	Finalize indexes re deposition preparation binders and marked exhibits; QC binder materials; e-mail correspondence with vendor re binder request; send binder materials via FTP to vendor.
11/23/2020	Maya S. Jumper	MSJ	3.4	\$475.00	\$1,615.00	Draft deficiency and comparator letter.
11/23/2020	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Review file and draft stipulation.
11/23/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Conference with CEG/SZG regarding case updates and next steps.
11/23/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding confidentiality designations.
11/23/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to opposing counsel regarding deposition of Diane Greene and extension request regarding errata.
11/23/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Revise stipulation regarding experts and draft correspondence to CEG/SZG regarding same.
						Prepare agenda for team meeting (.4); Case management meeting (.6); Correspondence with MSI (.2); Correspondence re Eryurek and Wilson depo logistics (.3); Correspondence re Diane Greene binders (.2); Review deposition exhibits re confidentiality designations (.6); Review of documents, depo testimony, conduct research, outline opposition to Google's motion (3.6); Review Google's filing and exhibits (1.3); Correspondence with client (.3); Review draft of deficiency letter (.7); finish drafting depo objectives and documents for Burdis, send to CEG (.7).
11/23/2020	Shira Gelfand	SZG	8.9	\$425.00	\$3,782.50	
11/23/2020	Tara K. Quaglion	TKQ	5.1	\$450.00	\$2,295.00	Review Stuart Breslow deposition and prepare memorandum regarding same.
11/24/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Update recent filings from the defendant's.
11/24/2020	Cara E. Greene	CEG	0.6	\$950.00	\$570.00	Correspondence with litigation team re protective order motion and review pre-motion letter to the court
11/24/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review court order and draft correspondence to CEG/SZG regarding deadlines and next steps
						Review correspondence from opposing counsel and draft correspondence to CEG/SZG regarding case strategy and next steps.
11/24/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	
11/24/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from opposing counsel regarding scheduling and draft response
11/24/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to BK regarding calendaring.
11/24/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review file; draft correspondence to AXR regarding relevancy redaction briefing
11/24/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to CEG/SZG briefing deadlines.
11/24/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review letter to court from opposing counsel regarding briefing scheduled
						Review Court order, review Judge rules, correspondence with MSI and CEG re same (.8); correspondence with opposing counsel (.4); Review Google filing (.2); Begin drafting deposition outline for J Burdis, review of documents (3.1); Correspondence with US legal re next week deposition (.2).
11/24/2020	Shira Gelfand	SZG	4.5	\$425.00	\$1,912.50	
11/25/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSI re cross-checking documents.
11/25/2020	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Review and revise documents from Defendant's.
11/25/2020	Cara E. Greene	CEG	0.7	\$950.00	\$665.00	Review and edit deficiency letter to opposing counsel.
11/25/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to client regarding errata and transcript verification
11/25/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to opposing counsel regarding request for extension.
11/25/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to BXK regarding para assignment.
11/25/2020	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Review transcript for errata.
						Correspondence with MSI re errata (.2); correspondence with client (.2); correspondence with counsel (.1); Continue drafting Burdis deposition outline (3.8); correspondence with CEG re binders (.1); edit and supplement letter, finalize and send to counsel (1.6).
11/25/2020	Shira Gelfand	SZG	6.0	\$425.00	\$2,550.00	
11/29/2020	Tara K. Quaglion	TKQ	3.0	\$450.00	\$1,350.00	Review Stuart Breslow deposition and prepare memorandum regarding same.
11/30/2020	Brian D. Kouassi	BDK	1.6	\$325.00	\$520.00	Extract job titles similar to Principal Technical Solutions Consultant
11/30/2020	Brian D. Kouassi	BDK	0.9	\$325.00	\$292.50	Download deposition transcripts re Stuart Vardaman.
11/30/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting.
11/30/2020	Maya S. Jumper	MSJ	4.2	\$475.00	\$1,995.00	Review transcript; errata and draft correspondence to client regarding verification
11/30/2020	Maya S. Jumper	MSJ	6.3	\$475.00	\$2,992.50	Conduct legal research and draft opposition brief.
						Prepare agenda for team meeting (.4); correspondence with counsel (.3); Team meeting (.5); call with MSI (.2); correspondence with client (.3); Prepare objectives and bio for Ben Wilson deposition (1.7); begin drafting RFAs, review o documents re same (2.6); correspondence with US Legal re depo logistics (.2); review Judge rules re briefing schedule, correspondence with CEG and MSI re same (.3).
11/30/2020	Shira Gelfand	SZG	6.3	\$425.00	\$2,677.50	
11/30/2020	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Send agenda to client for call.
11/30/2020	Tara K. Quaglion	TKQ	6.0	\$450.00	\$2,700.00	Review Stuart Breslow and Kevin Lucas depositions and prepare memorandum regarding same.
12/01/2020	Cara E. Greene	CEG	4.2	\$950.00	\$3,990.00	Telephone call with client (.5); prep for B. Wilson deposition (2.8); review and edit letter to court re D. Greene (.9)
12/01/2020	Michaela Dougherty	MDX	0.1	\$350.00	\$35.00	Review local rules re opposition filing limits; e-mail correspondence with MSI and SZG
						E-mail correspondence with JLM re opposition filing; review draft opposition papers and pull exhibits; cleanup discovery caselfile.
12/01/2020	Michaela Dougherty	MDX	0.7	\$350.00	\$245.00	
12/01/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review file and draft correspondence to MXD regarding exhibit to opposition
12/01/2020	Maya S. Jumper	MSJ	1.8	\$475.00	\$855.00	Review and revise opposition brief.
12/01/2020	Maya S. Jumper	MSJ	0.8	\$475.00	\$380.00	Review protective order and draft correspondence to opposing counsel regarding confidentiality designations
12/01/2020	Maya S. Jumper	MSJ	5.7	\$475.00	\$2,707.50	Review final exhibits and monitor filing.
12/01/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Conference call with CEG/SZG/client regarding case updates and depositions.
12/01/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to PC outreach team.
12/01/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to opposing counsel regarding discovery deadline and revised depo notice

Rowe v. Google LLC
Case No. 19-cv-08655 (JHR)
Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
12/01/2020	Shira Gelfand	SZG	9.3	\$425.00	\$3,952.50	Call with client (.7); Continue drafting Burdis deposition outline (1.8); Continue drafting RFAs (2.3); Edit and supplement opposition to Google's MPO, conduct research re same, prepare for filing (3.2); correspondence with counsel (.3); Prep documents for Ben Wilson deposition (.6); Correspondence with BXK and review of job title analysis (.4).
12/01/2020	Tara K. Quaglione	TKQ	6.0	\$450.00	\$2,700.00	Review Kevin Lucas deposition and prepare memorandum regarding same.
12/02/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re deposition job descriptions.
12/02/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re Errata and Verification for Deposition Transcript
12/02/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Save Certified Copy and Errata Sheet re Tariq Shaikat's Deposition Transcript.
12/02/2020	Brian D. Kouassi	BDK	1.4	\$325.00	\$455.00	Draft and compile job descriptions break down for SZG's review.
12/02/2020	Cara E. Greene	CEG	8.4	\$950.00	\$7,980.00	Finish preparing for B. Wilson deposition (2.6); take deposition of B. Wilson (5.8)
12/02/2020	Maya S. Jumper	MSJ	0.0	\$0.00	\$0.00	Schedule M&C.
12/02/2020	Maya S. Jumper	MSJ	8.0	\$475.00	\$3,800.00	Attend deposition.
12/02/2020	Shira Gelfand	SZG	9.9	\$425.00	\$4,207.50	Prep for deposition (1.4); deposition of Ben Wilson (5.7); correspondence with MSJ and CEG (.2); Correspondence with counsel (.2); Continue drafting RFAs (1.2); attention to documents and marked exhibits for Eryurek deposition (.8); Draft update to client (.4).
12/02/2020	Tara K. Quaglione	TKQ	4.0	\$450.00	\$1,800.00	Review Kevin Lucas deposition and prepare memorandum regarding same.
12/03/2020	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Download deposition exhibits.
12/03/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Save downloaded deposition exhibits to case files.
12/03/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with EJT re outreach campaign to potential clients re Cision and TrendKite
12/03/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with EJT re outreach campaign to potential clients re Cision and TrendKite
12/03/2020	Brian D. Kouassi	BDK	2.4	\$325.00	\$780.00	Download media and video files of depositions.
12/03/2020	Cara E. Greene	CEG	7.8	\$950.00	\$7,410.00	Prepare for deposition of E. Eryurek (3.5); take deposition of E. Eryurek (4.0); meet and confer call with opposing counsel (.3).
12/03/2020	Michaela Dougherty	MDX	0.2	\$350.00	\$70.00	Prepare PDF portfolio of deposition documents; e-mail correspondence with MSJ; review marked exhibits
12/03/2020	Maya S. Jumper	MSJ	5.0	\$475.00	\$2,375.00	Second chaired deposition.
12/03/2020	Maya S. Jumper	MSJ	0.7	\$475.00	\$332.50	Attend meet and confer regarding discovery disputes.
12/03/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Conf call with SZG/CEG regarding debrief and motion briefing
12/03/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conf call with SZG motion briefing.
12/03/2020	Maya S. Jumper	MSJ	1.2	\$475.00	\$570.00	Review file and prepare for deposition.
12/03/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Review notes and draft correspondence to opposing counsel regarding m&c.
12/03/2020	Shira Gelfand	SZG	9.6	\$425.00	\$4,080.00	Eryurek deposition prep (.8); Eryurek deposition (1.1); Meet and confer with Paul Hastings (.8); Call with MSJ and CEG (.3); Call with MSJ (.3); Continue drafting RFA's (2.2); Continue drafting Burdis deposition outline (1.3); Begin drafting letter motion to compel (2.8); correspondence with client (.1).
12/03/2020	Tara K. Quaglione	TKQ	5.0	\$450.00	\$2,250.00	Review Kevin Lucas and Bernita Jamison depositions and prepare memorandum regarding same.
12/04/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Update transcript folder with recent transcripts from the depositions.
12/04/2020	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Update docket folder with recent filings.
12/04/2020	Cara E. Greene	CEG	1.0	\$950.00	\$950.00	Review J. Burdis depo outline (.7); telephone call with SZG re same (.3)
12/04/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to TXQ regarding deposition digests.
12/04/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to TXQ regarding deposition digests.
12/04/2020	Shira Gelfand	SZG	4.8	\$425.00	\$2,040.00	Prepare for call with CEG re Burdis prep (.4); Call with CEG (.3); Continue drafting letter motion, review deposition transcripts, and conduct research (3.6); Correspondence with MSJ re digests (.2); review correspondence with counsel (.2).
12/04/2020	Tara K. Quaglione	TKQ	5.0	\$450.00	\$2,250.00	Review Bernita Jamison deposition and prepare memorandum regarding same.
12/05/2020	Maya S. Jumper	MSJ	1.4	\$475.00	\$665.00	Review transcripts and conduct legal research on motion to amend.
12/05/2020	Shira Gelfand	SZG	4.3	\$425.00	\$1,827.50	Continue research and writing, drafting motion to compel.
12/05/2020	Tara K. Quaglione	TKQ	8.0	\$450.00	\$3,600.00	Review Bernita Jamison and Ben Wilson depositions and prepare memorandum regarding same
12/06/2020	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence re amended complaint.
12/06/2020	Shira Gelfand	SZG	5.6	\$425.00	\$2,380.00	Review Defendant's motion to seal, letter in furtherance of support re motion to quash Greene deposition, declarations re same (2.1); continue drafting letter re motion to compel, conduct research re same, review deposition transcripts and exhibits, continue drafting RFAs (3.3); correspondence with MSJ and CEG re motion to amend (.2).
12/07/2020	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Update docket folder with recent filing from the court.
12/07/2020	Brian D. Kouassi	BDK	0.8	\$325.00	\$260.00	Pull documents and create exhibits re Motion to Supplement Pleadings.
12/07/2020	Brian D. Kouassi	BDK	1.1	\$325.00	\$357.50	Pull transcript excerpts re Motion to Supplement Pleadings.
12/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re exhibits and transcript excerpts re Motion to Supplement Pleadings
12/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re exhibits and transcript excerpts re Motion to Supplement Pleadings
12/07/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re exhibits and transcript excerpts re Motion to Supplement Pleadings
12/07/2020	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Review and edit letter to MJ re supplementing complaint.
12/07/2020	Michaela Dougherty	MDX	2.0	\$350.00	\$700.00	Review marked exhibits; update J. Burdis deposition prep binder; update casefile; e-mail correspondence with SZGre depo prep.
12/07/2020	Maya S. Jumper	MSJ	5.8	\$475.00	\$2,755.00	Conduct legal research and draft motion to supplement pleadings.
12/07/2020	Maya S. Jumper	MSJ	1.3	\$475.00	\$617.50	Revise and draft supplemental complaint and draft correspondence to opposing counsel regarding same
12/07/2020	Shira Gelfand	SZG	10.7	\$425.00	\$4,547.50	Draft RFAs, send to team for review (2.3); Call with MSJ (.2); correspondence with MXD and BXK re paralegal assignments (.4); Continue drafting Burdis outline and review of documents (4.3); Correspondence with counsel (.3); edit pre-motion letter to court, send to CEG and MSJ (1.6); Review motion to file supplemental pleadings and attached letter, correspondence with CEG and MSJ re same (1.3); correspondence with client (.3).
12/07/2020	Tara K. Quaglione	TKQ	6.0	\$450.00	\$2,700.00	Review Ben Wilson deposition and prepare memorandum regarding same.
12/08/2020	Brian D. Kouassi	BDK	0.7	\$325.00	\$227.50	Download production from Defendant's counsel.
12/08/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re downloading Defendant's production.
12/08/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re downloading Defendant's production.
12/08/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re downloading Defendant's production.
12/08/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail re uploading Defendant's recent production
12/08/2020	Brian D. Kouassi	BDK	0.8	\$325.00	\$260.00	Finalize letter, exhibits, and transcript excerpts re Pre-Motion Letter re Motion to Supplement Pleadings
12/08/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MCD re finalized letter, exhibits, and transcript excerpts re Pre-Motion Letter re Motion to Supplement Pleadings.
12/08/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MCD re finalized letter, exhibits, and transcript excerpts re Pre-Motion Letter re Motion to Supplement Pleadings.
12/08/2020	Cara E. Greene	CEG	2.3	\$950.00	\$2,185.00	Review and edit Burdis deposition outline and review related documents (1.8); meeting with SZG re Burdis deposition (.5).
12/08/2020	Michaela Dougherty	MDX	1.0	\$350.00	\$350.00	Prepare documents for pre-motion letter filing; e-mail correspondence with MSJ
12/08/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review file and draft correspondence to BK regarding deposition digests.
12/08/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review file; draft correspondence to MXD regarding filing prep
12/08/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from MXD regarding filing prep.
12/08/2020	Maya S. Jumper	MSJ	0.7	\$475.00	\$332.50	Review and finalize supplemental complaint.
12/08/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review and finalize letter to court regarding suppl complaint.
12/08/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Draft correspondence to CEG/SZG regarding filing.

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Case No. 19-cv-08655 (JHR)
Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
12/08/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to MXD regarding filing status.
12/08/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from MXD regarding filing update and draft response.
12/08/2020	Naomi Campusano	NCX	1.2	\$350.00	\$420.00	Import defendant's production into Nuix and email team re same.
12/08/2020	Shira Gelfand	SZG	8.3	\$425.00	\$3,527.50	Conference with CEG re Burdis depo (1.0); Prepare for Burdis deposition, review of documents (5.6); Prepare client update (.6); correspondence with MSJ (.3); Review updated supplemental pleading and letter motion (.8).
12/08/2020	Tara K. Quaglione	TKQ	7.0	\$450.00	\$3,150.00	Review Ben Wilson and Stuart Vardaman depositions and prepare memorandum regarding same
12/09/2020	Brian D. Kouassi	BDK	0.6	\$325.00	\$195.00	Edit Proposed Supplemental Complaint.
12/09/2020	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Edits to the Letter Motion re Proposed Motion to Supplement Pleadings.
12/09/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re edits to Proposed Supplement Pleadings.
12/09/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Proofread Motion and Proposed Motion.
12/09/2020	Cara E. Greene	CEG	5.3	\$950.00	\$5,035.00	Review final J. Burdis outline (.5); Second chair J. Burdis deposition (4.8)
12/09/2020	Michaela Dougherty	MDX	1.5	\$350.00	\$525.00	Prepare and finalize exhibits re pre-motion letters re motion to compel production and motion to supplement pleadings.
12/09/2020	Maya S. Jumper	MSJ	3.2	\$475.00	\$1,520.00	Revise Suppl. Complaint and Pre-motion letter and accompanying exhibits.
12/09/2020	Maya S. Jumper	MSJ	5.4	\$475.00	\$2,565.00	Monitor filing and draft correspondence to opposing counsel regarding confidentiality
12/09/2020	Shira Gelfand	SZG	9.3	\$425.00	\$3,952.50	Prepare for Burdis deposition (3.4); Jenny Burdis deposition (5.1); Call with CEG (.2); correspondence with MSJ (.2); correspondence re pro motion letter, review filing (.4).
12/09/2020	Tara K. Quaglione	TKQ	5.0	\$450.00	\$2,250.00	Review Stuart Vardaman deposition and prepare memorandum regarding same.
12/10/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re filing letter.
12/10/2020	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Prepare for upcoming filing of Letter re Request for Pre-Motion Conference
12/10/2020	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	File Letter Request for Pre-Motion Conference.
12/10/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Prepare confidential exhibits to be sent to Judge.
12/10/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re upcoming filing to the SDNY.
12/10/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re upcoming filing to the SDNY.
12/10/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re upcoming filing to the SDNY.
12/10/2020	Michaela Dougherty	MDX	0.3	\$350.00	\$105.00	Outline tasks re upcoming motion filings; e-mail correspondence with BNK
12/10/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with CEG/SZG regarding case updates and next steps.
12/10/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to BK regarding filing.
12/10/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to chambers regarding sealed exhibits.
12/10/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to BK regarding calendaring.
12/10/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to SZG/BK regarding calendar and judge's standing order.
12/10/2020	Shira Gelfand	SZG	6.0	\$425.00	\$2,550.00	Review of Burdis transcript and review documents, edit and supplement requests for admission (3.2); call with MSJ (.2); correspondence with BK and MD re MTC letter (.3); Begin document review of Google's new production (2.1); review court Order re motion to supplement pleadings briefing schedule, correspondence with MSJ re same (.2).
12/10/2020	Tara K. Quaglione	TKQ	5.3	\$450.00	\$2,385.00	Review Stuart Vardaman deposition and prepare memorandum regarding same.
12/11/2020	Cara E. Greene	CEG	1.3	\$950.00	\$1,235.00	Review and edit RFAs and serve same.
12/11/2020	Daniel Stromberg	DXS	0.3	\$875.00	\$262.50	Assess document access issue in Nuix per SZG, update configuration and advise.
12/11/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG regarding case background and draft response.
12/11/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review RFAs and draft correspondence to SZG regarding proposed edits.
12/11/2020	Shira Gelfand	SZG	5.8	\$425.00	\$2,465.00	Continue review of new production (1.7); Draft and finalize RFAs, correspondence with MSJ and CEG (2.8); correspondence with BK and edit comparator letter (1.3).
12/11/2020	Tara K. Quaglione	TKQ	6.0	\$450.00	\$2,700.00	Review Stuart Vardaman and Brian Stevens depositions and prepare memorandum regarding same.
12/13/2020	Shira Gelfand	SZG	0.6	\$425.00	\$255.00	Review finalized RFAs (.4); correspondence with CEG and MSJ re briefing schedule (.2)
12/14/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Phone conference with MSJ re summary judgement.
12/14/2020	Cara E. Greene	CEG	1.0	\$950.00	\$950.00	Case management meeting (1.0); review and edit meet and confer letter to opposing counsel (.2);.
12/14/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference call with BXX regarding calendaring and motion schedule
12/14/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Draft correspondence to opposing counsel regarding proposed schedule
12/14/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review and revise correspondence from SZG regarding correspondence to opposing counsel
12/14/2020	Maya S. Jumper	MSJ	7.0	\$475.00	\$3,325.00	Draft motion to supplement pleadings.
12/14/2020	Shira Gelfand	SZG	6.6	\$425.00	\$2,805.00	Prepare meeting agenda (.5); Meeting with MSJ and CEG (1.0); call with MSJ (.2); Prepare email to counsel re outstanding issues, review of documents and correspondence, conduct research re same (1.8); Prepare draft motion for extension of time (1.2); correspondence with counsel (.2); prepare agenda for client call (.4); correspondence with BK re RFA deadline (.2); Review RFA compare (.8); correspondence with client re comp (.3).
12/14/2020	Tara K. Quaglione	TKQ	3.0	\$450.00	\$1,350.00	Review Brian Stevens deposition and prepare memorandum regarding same.
12/15/2020	Cara E. Greene	CEG	2.1	\$950.00	\$1,995.00	Update call with client (.4); review and edit letter to the court re comparator data (1.7)
12/15/2020	Michaela Dougherty	MDX	1.0	\$350.00	\$350.00	Prepare exhibit list re exhibit lists re pre-motion letters re motion to compel production and motion to supplement pleadings.
12/15/2020	Maya S. Jumper	MSJ	10.2	\$475.00	\$4,845.00	Review and revise motion; monitor filing.
12/15/2020	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Conference with client/CEG regarding case updates.
12/15/2020	Sara Olson	SXO	0.3	\$350.00	\$105.00	Save and rename deposition transcripts and marked exhibits to case file.
12/15/2020	Sara Olson	SXO	0.2	\$350.00	\$70.00	Pull and compile deposition cites for pre-motion brief
12/15/2020	Sara Olson	SXO	0.7	\$350.00	\$245.00	Quality check confidential marks on citations and exhibits to pre-motion letter
12/15/2020	Sara Olson	SXO	0.2	\$350.00	\$70.00	Correspondence with MDX, MSJ re pre-motion letter to court.
12/15/2020	Sara Olson	SXO	0.2	\$350.00	\$70.00	Correspondence with SXG re pre-motion letter to court.
12/15/2020	Shira Gelfand	SZG	4.1	\$425.00	\$1,742.50	Edit and supplement pre-motion letter re comparator evidence, prepare for filing, review transcripts, conduct research re same (3.2); correspondence with MSJ and CEG (.3); correspondence with SO re filing, exhibit and transcript cites (.4); correspondence with counsel re exhibits and transcript cites (.2).
12/15/2020	Tara K. Quaglione	TKQ	6.0	\$450.00	\$2,700.00	Review Brian Stevens and Evren Eryurek depositions and prepare memorandum regarding same.
12/16/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re filing and updated transcripts.
12/16/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re filing and updated transcripts.
12/16/2020	Brian D. Kouassi	BDK	2.6	\$325.00	\$845.00	Edit exhibits to Pre-Motion Letter re MTC Production.
12/16/2020	Brian D. Kouassi	BDK	1.6	\$325.00	\$520.00	Finalize Pre-Motion Letter re MTC Production for finalizing
12/16/2020	Cara E. Greene	CEG	0.9	\$950.00	\$855.00	Review and edit pre-motion letter to court (.7); review and edit scheduling order (.2)
12/16/2020	Maya S. Jumper	MSJ	1.4	\$475.00	\$665.00	Review CEG edits and revise and draft correspondence to CEG/SZG regarding same.
12/16/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to opposing counsel regarding stipulation regarding expert discovery
12/16/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to opposing counsel regarding scheduling.
12/16/2020	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review and revise proposed schedule.
12/16/2020	Sara Olson	SXO	0.2	\$350.00	\$70.00	Correspondence with BDK re pre-motion filing.
12/16/2020	Shira Gelfand	SZG	4.4	\$425.00	\$1,870.00	Correspondence with counsel (.3); Edit and supplement pre-motion letter re comparators, correspondence with BXX re exhibits, review same (3.1); review ECF filings (.2); edit and supplement joint motion for extension (.6); correspondence with MSJ (.2).
12/16/2020	Tara K. Quaglione	TKQ	4.0	\$450.00	\$1,800.00	Review Evren Eryurek deposition and prepare memorandum regarding same.
12/17/2020	Brian D. Kouassi	BDK	2.6	\$325.00	\$845.00	Finalize Pre-Motion Letter re MTC Production.
12/17/2020	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting.
12/17/2020	Jennifer LaMarch	JLM	0.3	\$350.00	\$105.00	File pre-motion letter and letter requesting extension of time.

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
12/17/2020	Michaela Dougherty	MDX	3.0	\$350.00	\$1,050.00	E-mail correspondence with BDK, MSJ, and SZG re exhibits; finalize and file motion documents re supplement pleadings.
12/17/2020	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with CEG/SZG regarding case updates and next steps.
12/17/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review agenda for team call and draft response.
12/17/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to opposing counsel regarding schedule.
12/17/2020	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from opposing counsel regarding executed stipulation and confidentiality designations
12/17/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to JLM regarding filing.
12/17/2020	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from JLM/SZG regarding filing.
12/17/2020	Sara Olson	SXO	0.1	\$350.00	\$35.00	Correspondence with MDX re deposition index in case file.
12/17/2020	Shira Gelfand	SZG	6.4	\$425.00	\$2,720.00	Edit and supplement joint request for extension, pre-motion letter re motion to compel, and joint stipulation, review exhibits, correspondence with counsel re same, correspondence with MSJ, BK, MD, and JLM re filing, finalize filing (5.8); prepare agenda for case management meeting (.3); case management meeting with CEG, MSJ (.6).
12/18/2020	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Update Docket folder with recent filings.
12/18/2020	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Edit meet and confer letter to opposing counsel.
12/18/2020	Shira Gelfand	SZG	3.7	\$425.00	\$1,572.50	Draft response to counsel, conduct research and review docs re same (1.1); Begin drafting out line for pre-motion letter re summary judgment (2.6).
12/18/2020	Tara K. Quaglione	TKQ	5.4	\$450.00	\$2,430.00	Review Evren Eryurek deposition and prepare memorandum regarding same.
12/21/2020	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Update Docket folder with new filings from the court.
12/21/2020	Shira Gelfand	SZG	3.9	\$425.00	\$1,657.50	Begin drafting pre-motion SJ letter, research, review of deposition transcripts and documents (3.2); correspondence with client (.2); correspondence with counsel (.2); review Court orders (.2); correspondence with BKK re assignment (.1).
12/22/2020	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Create folders in preparation of oral arguments.
12/22/2020	Shira Gelfand	SZG	1.4	\$425.00	\$595.00	Edit and supplement SJ letter (1.3); correspondence with BK (.1).
12/28/2020	Brian D. Kouassi	BDK	0.6	\$325.00	\$195.00	Update docket folder with recent filings to the Court.
12/28/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from opposing counsel regarding confidentiality designation and draft response to opposing counsel regarding same.
12/29/2020	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to client regarding case updates.
01/04/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Phone conference with MSJ re various topics.
01/04/2021	Brian D. Kouassi	BDK	1.9	\$325.00	\$617.50	Download defendant's production.
01/04/2021	Brian D. Kouassi	BDK	3.5	\$325.00	\$1,137.50	Compile documents re Defendant's Motion to Quash Diane Greene's Subpoena.
01/04/2021	Brian D. Kouassi	BDK	1.3	\$325.00	\$422.50	File transfer of production from Defendants to O&G system and send to Ringtail admins
01/04/2021	Cara E. Greene	CEG	1.7	\$950.00	\$1,615.00	Case management meeting (.5); review file for oral arguments (1.2).
01/04/2021	Michaela Dougherty	MDX	1.0	\$350.00	\$350.00	E-mail correspondence with MSJ and BNK re upcoming hearings; pull cases cited in Defendant's briefs; review Judge's standing order re page limits.
01/04/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review file and draft correspondence to BK/MD regarding binder assignment for oral arg
01/04/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review opposing counsel's opp to motion to supplement.
01/04/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review and draft correspondence to BK regarding binder project for OA
01/04/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with CEG/SZG regarding case update and next steps.
01/04/2021	Maya S. Jumper	MSJ	2.9	\$475.00	\$1,377.50	Conduct legal research and draft reply.
01/04/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conf with BK regarding oral argument prep.
01/04/2021	Naomi Campusano	NCX	1.2	\$350.00	\$420.00	Import defendant's production into Nuix and email team re same.
01/04/2021	Shira Gelfand	SZG	4.8	\$425.00	\$2,040.00	Review Defendant's response to comparator motion, prepare counter arguments in advance of conference (2.3); Review Defendant's reply re motion to supplement pleadings (1.1); Correspondence with BKK re production and binders (.5); Prepare agenda for team meeting (.3); case mgmt meeting with CEG and MSJ (.4); correspondence with client (.2);.
01/05/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re pulling court cases cited in comparator motion and letter
01/05/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with CXT re pulling court cases cited in comparator motion and letter
01/05/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with JLM re deadline to appeal Magistrate Judge's decision.
01/05/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re downloading deposition transcripts.
01/05/2021	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Save final version of deposition transcript to case database.
01/05/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Update docket calendar re objections to Judge's order.
01/05/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re saving deposition transcripts.
01/05/2021	Brian D. Kouassi	BDK	0.8	\$325.00	\$260.00	Update and save multiple transcripts from depositions.
01/05/2021	Brian D. Kouassi	BDK	1.1	\$325.00	\$357.50	Pull court cases cited in comparator motion and letter.
01/05/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with JLM re deadline to appeal Magistrate Judge's decision.
01/05/2021	Cara E. Greene	CEG	3.1	\$950.00	\$2,945.00	Prepare for oral arguments (.9); participate in oral arguments (1.1) and debrief with team re same (.2); review and edit reply brief (.9).
01/05/2021	Jennifer LaMarch	JLM	0.2	\$350.00	\$70.00	File reply in support of motion to supplement pleadings.
01/05/2021	Michaela Dougherty	MDX	3.0	\$350.00	\$1,050.00	Prepare exhibits re reply to Defendant's opposition to plaintiff's motion for leave to supplement pleadings; finalize exhibit cites in reply brief; e-mail correspondence with MSJ and JLM.
01/05/2021	Maya S. Jumper	MSJ	5.8	\$475.00	\$2,755.00	Conduct legal research and draft reply to Defendant's.
01/05/2021	Maya S. Jumper	MSJ	3.2	\$475.00	\$1,520.00	Review and revise CEG edits to reply and monitor filing.
01/05/2021	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Attend oral argument on Defendant's motion for protective order.
01/05/2021	Shira Gelfand	SZG	4.2	\$425.00	\$1,785.00	Prepare for oral arguments, review filings and exhibits (1.6); Oral arguments (1.1); review draft reply brief re motion to supplement, review documents re same, correspondence with MSJ re same (1.3); correspondence with client (.2).
01/06/2021	Brian D. Kouassi	BDK	0.7	\$325.00	\$227.50	Save recent court filings to case database.
01/06/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Update case outline with new dates from the Court.
01/06/2021	Shira Gelfand	SZG	2.3	\$425.00	\$977.50	Review filed Reply (.7); Begin document review of new production (1.6)
01/07/2021	Cara E. Greene	CEG	0.7	\$950.00	\$665.00	Case meeting with client (.7).
01/07/2021	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Review correspondence from opposing counsel and correspondence with MSJ re same
01/07/2021	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Draft correspondence to opposing counsel regarding request for extension.
01/07/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to EJT regarding case management strategy.
01/07/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to BK regarding scheduling.
01/07/2021	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Conference call with client/CEG/SZG.
01/07/2021	Shira Gelfand	SZG	2.9	\$425.00	\$1,232.50	Send agenda to client (.3); continue document review (2.6).
01/08/2021	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Save documents pertaining to case in preparation to upload to Ringtail
01/08/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins re uploading case documents to system.
01/08/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re ordering transcripts from Court.
01/08/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re ordering transcripts from Court.
01/08/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re ordering transcripts from Court.
01/08/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with JLM re ordering transcripts from Court.
01/08/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with JLM re ordering transcripts from Court.
01/08/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with JLM re ordering transcripts from Court.
01/08/2021	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Finalize edits to production and send for review.
01/08/2021	Michaela Dougherty	MDX	0.1	\$350.00	\$35.00	E-mail correspondence with SZG, BNK, and JLM re transcript of court of proceedings; review transcript delivery costs.

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Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
01/08/2021	Naomi Campusano	NCX	1.0	\$350.00	\$350.00	Ingest client documents into Nuix and email team re same.
01/08/2021	Sara Olson	SXO	0.1	\$350.00	\$35.00	Calendar deadline.
01/08/2021	Shira Gelfand	SZG	6.3	\$425.00	\$2,677.50	Correspondence with counsel (.4); review court order (.2); Begin drafting reply, research re same, review deposition transcripts and documents (5.4); correspondence with BXK re outstanding tasks and production (.3).
01/10/2021	Shira Gelfand	SZG	2.1	\$425.00	\$892.50	Continue research and drafting reply motion.
01/11/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re locating deposition digests.
01/11/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Locate deposition digests and send for SZG's review.
01/11/2021	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Relocate Deposition Digests from iManage to the Y-Drive.
01/11/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re missing deposition digests.
01/11/2021	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Telephone call with SZG re comparator reply.
01/11/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Conference with SZG regarding case updates.
01/11/2021	Shira Gelfand	SZG	8.5	\$425.00	\$3,612.50	Prepare agenda for team meeting (.6); continue document review from 12/31 production (2.7); Continue research, drafting reply memo, review documents re same (4.8); call with CEG (.2); Correspondence with BXK re outstanding tasks (.2).
01/12/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re upcoming filing.
01/12/2021	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence with SZG re comparator data and updates.
01/12/2021	Maya S. Jumper	MSJ	1.6	\$475.00	\$760.00	Draft client decl ISO comparator letter.
01/12/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft agenda for client mtg.
01/12/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference with client regarding case updates and decl.
01/12/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from CEG regarding declaration topics.
01/12/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Schedule call with client.
01/12/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference regarding client regarding declaration.
01/12/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to client regarding opposing counsel's opposition
01/12/2021	Shira Gelfand	SZG	7.9	\$425.00	\$3,357.50	Call with client, correspondence with client (1.4); Continue research, review of deposition testimony and documents, drafting Reply motion (6.3); call with CEG (.2).
01/13/2021	Maya S. Jumper	MSJ	1.5	\$475.00	\$712.50	Review and revise reply to comparator letter.
01/13/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review revisions to draft declaration.
01/13/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to BK regarding deposition summaries.
01/13/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to TQ regarding deposition summary of J. Burdis depo
01/13/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to SXJ regarding TQ capacity.
01/13/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to opposing counsel regarding extension request.
01/13/2021	Shira Gelfand	SZG	7.7	\$425.00	\$3,272.50	Correspondence with client, review notes and prepare declaration (1.7); Correspondence with counsel (.2); correspondence with paralegals (.2); correspondence with MSJ (.3); Continue research, drafting reply motion (5.3).
01/13/2021	Tara K. Quaglione	TKQ	5.0	\$450.00	\$2,250.00	Review Jennifer Burdis deposition and prepare memorandum regarding same
01/14/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re pulling documents for upcoming filings
01/14/2021	Brian D. Kouassi	BDK	0.6	\$325.00	\$195.00	Pull documents for Plaintiff's upcoming filing of Plaintiff's reply to Defendant's reply to Plaintiff's Motion to Compel
01/14/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re pulling transcript excerpts for upcoming filing
01/14/2021	Brian D. Kouassi	BDK	2.5	\$325.00	\$812.50	Pull transcript cites for Plaintiff's reply to Defendant's response to Plaintiff's Motion to Compel
01/14/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re transcript excerpts.
01/14/2021	Cara E. Greene	CEG	1.6	\$950.00	\$1,520.00	Review and edit comparator reply and client declaration.
01/14/2021	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting.
01/14/2021	Maya S. Jumper	MSJ	1.3	\$475.00	\$617.50	Review file and exhibits; draft correspondence to opposing counsel regarding confidentiality designations
01/14/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Conference call with CEG/SZG regarding case updates and next steps.
01/14/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to BK regarding deposition summaries.
01/14/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Draft correspondence to BK regarding exhibit prep and confidentiality designations
01/14/2021	Maya S. Jumper	MSJ	0.7	\$475.00	\$332.50	Review exhibits and draft correspondence to opposing counsel regarding confidentiality waivers
01/14/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to BK regarding exhibits/ transcript citation.
01/14/2021	Shira Gelfand	SZG	3.1	\$425.00	\$1,317.50	Review MSJ edits to reply motion (.7); Prepare meeting agenda (.3); meeting with MSJ and CEG (.3); Document review (1.6); correspondence with Bxk re filing (.2).
01/15/2021	Cara E. Greene	CEG	1.9	\$950.00	\$1,805.00	Review and edit declaration, filing, correspondence re same.
01/15/2021	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Review file and revise client declaration.
01/15/2021	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Review CEG edits to declaration; review file and revise.
01/15/2021	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Review client edits to declaration and revise.
01/15/2021	Maya S. Jumper	MSJ	1.7	\$475.00	\$807.50	Review, finalize and monitor execution of declaration.
01/15/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to SZG regarding reply draft.
01/15/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to client regarding declaration and filing timeline
01/15/2021	Maya S. Jumper	MSJ	1.2	\$475.00	\$570.00	Review file and revise declaration based on client notes and reply cites
01/15/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Draft correspondence to CEG regarding declaration and Rowe transcript
01/15/2021	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Proof and send draft decl to client.
01/15/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review Rowe depo digest.
01/15/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Draft correspondence to CEG and client in response to client edits.
01/15/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Draft correspondence to TQ and review depo digest.
01/15/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review final decl for filing; monitor filing
01/15/2021	Shira Gelfand	SZG	6.3	\$425.00	\$2,677.50	Edit and supplement reply motion, declaration, call with CEG, correspondence with MSJ, proof and finalize exhibits, prepare for filing.
01/15/2021	Tara K. Quaglione	TKQ	2.4	\$450.00	\$1,080.00	Review Jennifer Burdis deposition and prepare memorandum regarding same
01/18/2021	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Correspondence with client.
01/20/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re saving Defendant's production.
01/20/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re saving Defendant's production.
01/20/2021	Brian D. Kouassi	BDK	0.8	\$325.00	\$260.00	Download Defendant's Production.
01/20/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with JLM re transcript of Oral Argument for Pending Motion for Protective Order
01/20/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Save transcript of Oral Argument for Pending Motion for Protective Order
01/20/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to opposing counsel regarding extension request.
01/20/2021	Shira Gelfand	SZG	0.8	\$425.00	\$340.00	Correspondence with counsel (.2); review of deposition transcripts from Google (.2); review court filing re transcript from hearing (.4).
01/21/2021	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting with SZG, MSJ.
01/21/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Conference with CEG/SZG regarding case updates and next steps.
01/21/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review agenda and draft response to CEG/SZG regarding case updates and next steps.
01/21/2021	Shira Gelfand	SZG	0.6	\$425.00	\$255.00	Case management meeting with CEG and MSJ (.5); prepare agenda (.1).
01/22/2021	Shira Gelfand	SZG	1.8	\$425.00	\$765.00	Draft letter to counsel, conduct research re same, attention to Plaintiff production (1.8)
01/25/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review file.
01/25/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review file and draft correspondence to BK regarding binder prep for OA
01/25/2021	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with client.
01/26/2021	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Review Defendant's Responses to RFAs.
01/26/2021	Shira Gelfand	SZG	1.7	\$425.00	\$722.50	Review RFA responses from Google.
01/28/2021	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Case management meeting with SZG.

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
01/28/2021	Shira Gelfand	SZG	1.4	\$425.00	\$595.00	Review RFAs, prepare notes (.8); correspondence with team, opposing counsel (.6).
01/29/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re producing documents to send Defendant's.
01/29/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins re producing documents to send to Defendant's counsel
01/29/2021	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Prepare production to send over to Defendant's.
01/29/2021	Naomi Campusano	NCX	1.7	\$350.00	\$595.00	Prepare documents for production in nux and email team re same
02/01/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re updating the folder of Plaintiff's Pre-Motion Letter to Compel with all relevant documents and cases.
02/01/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re updating the folder of Plaintiff's Pre-Motion Letter to Compel with all relevant documents and cases.
02/01/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re updating the folder of Plaintiff's Pre-Motion Letter to Compel with all relevant documents and cases.
02/01/2021	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Update the folder of Plaintiff's Pre-Motion Letter to Compel with all relevant documents and cases
02/01/2021	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting.
02/01/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference call with CEG/SZG regarding case updates and next steps.
02/01/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review file and agenda in prep for case update call.
02/01/2021	Maya S. Jumper	MSJ	2.8	\$475.00	\$1,330.00	Review briefs and legal authority in preparation for oral argument
02/01/2021	Shira Gelfand	SZG	3.1	\$425.00	\$1,317.50	Prepare agenda for meeting (.2); Meeting with CEG and MSJ (.4); correspondence with MSJ (.2); review of documents and continue drafting pre-motion ltr re SJ (2.2); correspondence with client (.1).
02/02/2021	Cara E. Greene	CEG	1.0	\$950.00	\$950.00	Moot MSJ for oral arguments and review materials for same.
02/02/2021	Maya S. Jumper	MSJ	2.8	\$475.00	\$1,330.00	Review file and prepare for oral argument.
02/02/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with CEG regarding prep for oral argument.
02/02/2021	Maya S. Jumper	MSJ	1.4	\$475.00	\$665.00	Prepare for moot with CEG.
02/02/2021	Shira Gelfand	SZG	1.5	\$425.00	\$637.50	Review Court order re oral arguments (.1); Review documents in advance of oral documents (1.4);
02/03/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re redacted transcripts and the process of unredaction for CEG's review
02/03/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re redacted transcripts and the process of un-redaction for CEG's review
02/03/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Compile un-reacted version of transcript exhibit excerpts.
02/03/2021	Cara E. Greene	CEG	2.1	\$950.00	\$1,995.00	Prepare for oral arguments on comparators and argue same.
02/03/2021	Maya S. Jumper	MSJ	2.6	\$475.00	\$1,235.00	Review file and prep for oral argument.
02/03/2021	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Attend oral argument on motion to supplement and motion to compel comparator data
02/03/2021	Sara Olson	SXO	0.4	\$350.00	\$140.00	Prepare unredacted deposition transcript excerpts for oral argument.
02/03/2021	Sara Olson	SXO	0.1	\$350.00	\$35.00	Correspondence with BDK and SZG re preparing unredacted deposition transcript excerpts for oral argument
02/03/2021	Shira Gelfand	SZG	3.4	\$425.00	\$1,445.00	Prep for oral argument (1.8); Oral arguments (1.0); correspondence with MSJ (.2); correspondence with counsel (.2); attention to court filing and transcript (.2).
02/04/2021	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting.
02/04/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference call with CEG/SZG regarding recap from OA, case updates and next steps.
02/04/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review agenda and attached correspondence in prep for call with CEG/SZG
02/04/2021	Shira Gelfand	SZG	1.3	\$425.00	\$552.50	Prepare agenda for team call (.2); case management meeting with CEG and MSJ (.3); correspondence with client (.2); correspondence with counsel (.1); write-up for firm update (.5).
02/05/2021	Shira Gelfand	SZG	1.9	\$425.00	\$807.50	Prep for call with client, send agenda (.3); review comparator names, draft consideration list for narrowing (1.1); call with client (.5);
02/08/2021	Cara E. Greene	CEG	1.0	\$950.00	\$950.00	Review list of comparators and correspondence with team re same (.3); case management meeting (.4); review and edit scheduling order and letter to court (.3).
02/08/2021	Maya S. Jumper	MSJ	0.9	\$475.00	\$427.50	Draft second amended complaint.
02/08/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from CEG regarding meeting reschedule.
02/08/2021	Maya S. Jumper	MSJ	2.8	\$475.00	\$1,330.00	Review correspondence from client; client data and draft comparator proposal to CEG/SZG
02/08/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to client regarding comparator analysis.
02/08/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Reschedule weekly call.
02/08/2021	Shira Gelfand	SZG	6.3	\$425.00	\$2,677.50	Attention to comparator names, correspondence with client re same (2.7); Jenny Burdis depo digest (2.4); Draft scheduling order (.6); Draft agenda for team call (.3); edit to scheduling order and correspondence with counsel (.3).
02/09/2021	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Review proposed scheduling order and letter to court.
02/09/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review file and draft correspondence to CEG/SZG regarding depo date options
02/09/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference call with AB regarding prep for summary judgment.
02/09/2021	Shira Gelfand	SZG	2.5	\$425.00	\$1,062.50	Continue drafting Burdis depo digest (1.7); review updated scheduling order from client (.2); correspondence with CEG and MSJ (.2); review updated list of comparators, correspondence re same (.4).
02/10/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Phone conference with MSJ re updating list of comparators.
02/10/2021	Brian D. Kouassi	BDK	2.2	\$325.00	\$715.00	Update list of comparators.
02/10/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re updating list of comparators.
02/10/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re updating list of comparators.
02/10/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re updating list of comparators.
02/10/2021	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Correspondence re comparator lists; telephone call with MSJ, SZG re same.
02/10/2021	Michaela Dougherty	MDX	0.2	\$350.00	\$70.00	Finalize proposed scheduling order; e-mail correspondence with SZG and MSJ re same
02/10/2021	Maya S. Jumper	MSJ	1.6	\$475.00	\$760.00	Review comparator data and draft proposal to CEG/SZG.
02/10/2021	Maya S. Jumper	MSJ	3.0	\$475.00	\$1,425.00	Review and revise comparator discovery list and draft correspondence to client/opposing counsel regarding same
02/10/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with CEG/SZG regarding comparator list and outstanding tasks.
02/10/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to BK regarding research assignment.
02/10/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Conference call with BK regarding research assignment.
02/10/2021	Maya S. Jumper	MSJ	0.7	\$475.00	\$332.50	Review and revise comparator spreadsheet.
02/10/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review correspondence from CEG regarding comparator list and draft correspondence to client
02/10/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to opposing counsel regarding comparator list.
02/10/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Conference with SZG regarding comparator list.
02/10/2021	Shira Gelfand	SZG	5.9	\$425.00	\$2,507.50	Meeting with CEG and MSJ (.5); finalize scheduling order and attention to file (.7); finalize list of comparators, conduct research re same, send to counsel (4.3); call with MSJ (.1); correspondence with client (.1); attention to client deposition scheduling (.2); review court endorsement of scheduling order (.1).
02/11/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to opposing counsel regarding SAC filing.
02/11/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG to client regarding depo prep.
02/11/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review client deposition notice.
02/11/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Revise second amended complaint and draft correspondence to CEG regarding same.
02/11/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review and incorporate CEG edits to Second amended complaint.
02/11/2021	Shira Gelfand	SZG	4.5	\$425.00	\$1,912.50	Continue drafting Burdis deposition digest (2.7); call with MSJ (.2); correspondence with client and review of relevant deposition transcripts for additional claim (1.4); correspondence with opposing counsel (.2).
02/12/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re upcoming filing of Second Amended Complaint
02/12/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re upcoming filing of Second Amended Complaint
02/12/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re upcoming filing of Second Amended Complaint
02/12/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ and JLM re upcoming filing of Second Amended Complaint
02/12/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ and JLM re upcoming filing of Second Amended Complaint

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Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
02/12/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ and JLM re upcoming filing of Second Amended Complaint
02/12/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Look at Judge's rules in preparation of filing.
02/12/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Update case database with new documents from the court.
02/12/2021	Cara E. Greene	CEG	0.6	\$950.00	\$570.00	Review and edit second amended complaint, correspondence re same.
02/12/2021	Jennifer LaMarch	JLM	0.3	\$350.00	\$105.00	File second amended complaint.
02/12/2021	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Review and revise second amended complaint.
02/12/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Accept revisions and draft correspondence to CEG regarding SAC.
02/12/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Monitor filing of SAC.
02/12/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to BK regarding filing and court rule review
02/12/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review filed SAC.
02/12/2021	Shira Gelfand	SZG	3.1	\$425.00	\$1,317.50	Review amended complaint, attention to filing (.8); Finish Burdis digest (2.3)
02/16/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with JLM re transcript from Oral Argument.
02/16/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Save transcript of oral argument to case files.
02/16/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ and SZG re Oral Argument transcript.
02/16/2021	Shira Gelfand	SZG	2.7	\$425.00	\$1,147.50	Review of documents and begin proof chart (2.3); review of transcript from court hearing (.4)
	Shira Gelfand	SZG	2.5	\$425.00	\$1,062.50	Continue drafting proof chart- equal pay claims, review documents and deposition transcript re same (2.3); review filing from court re transcript from hearing (.2).
02/18/2021	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Correspondence re comparators, etc.
02/18/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review file and draft correspondence to opposing counsel regarding comparator list
						Review correspondence from CEG regarding scheduling and draft correspondence to SZG/CEG regarding comparators and depo prep.
02/18/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	
02/18/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from CEG regarding comparators and draft response.
02/18/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to client regarding depo prep.
02/18/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to CEG regarding deadlines and comparator list to opposing counsel
02/18/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to opposing counsel regarding comparator list.
02/18/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to BK regarding calendaring production of comparator information
02/18/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from CEG regarding comparator confirmation
						Correspondence with counsel (.1); correspondence with team (.2); review of comparator list and cross reference Google documents (.7); begin proof chart re retaliation claims (2.3); review documents re supplemental claim for client meeting prep (.6).
02/18/2021	Shira Gelfand	SZG	3.9	\$425.00	\$1,657.50	
02/19/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re extraction of exhibits.
02/19/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Extraction of exhibits re SZG review.
02/19/2021	Cara E. Greene	CEG	1.5	\$950.00	\$1,425.00	Deposition prep meeting with client.
02/19/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding depo prep notes.
						Review of documents and prep for call with client (.8); depo prep session with client (1.2); correspondence with MSJ (.2); correspondence with counsel re deposition and discovery, attention to documents re same (.7).
02/19/2021	Shira Gelfand	SZG	2.9	\$425.00	\$1,232.50	
02/22/2021	Brian D. Kouassi	BDK	1.2	\$325.00	\$390.00	Update privilege log regarding documents withheld.
02/22/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review docket and draft correspondence to SZG regarding expert discovery deadline.
02/22/2021	Maya S. Jumper	MSJ	0.9	\$475.00	\$427.50	Review file, correspondence from SZG and draft correspondence to BK regarding privilege log revisions
						Attention to production of documents, review documents, correspondence with client, review privilege log, correspondence with counsel (1.3); Call with AVK re 56.1 and proof chart strategy (.2); Create agenda for team email update/meeting (.5); Continue drafting proof chart, review of documents (2.6); Review documents in prep for deposition, attention to document link (.8).
02/22/2021	Shira Gelfand	SZG	5.2	\$425.00	\$2,210.00	
02/23/2021	Cara E. Greene	CEG	2.6	\$950.00	\$2,470.00	Deposition continuation (2.2); review documents produced in discovery (.4)
02/23/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review and respond to correspondence from CEG/SZG regarding privilege log.
02/23/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review, revise and circulate privilege log to opposing counsel.
02/23/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence in response to SZG regarding privilege log.
						Prep for client deposition, review documents (1.7); deposition (2.5); attention to privilege log and review of documents (1.1); correspondence with client (.2); research privilege question (.8).
02/24/2021	Shira Gelfand	SZG	0.4	\$425.00	\$170.00	Correspondence with counsel (.2); correspondence with client re production (.2)
						Correspondence with client (.2); correspondence with CEG and MSJ (.2); attention to client files, correspondence with BKK (.1); correspondence with opposing counsel (.1).
02/25/2021	Shira Gelfand	SZG	0.6	\$425.00	\$255.00	
02/26/2021	Daniel Stromberg	DXS	0.2	\$875.00	\$175.00	Advise SXG re: collection methodology for client outlook.com emails
						Correspondence with client, attention to client document production, correspondence with DXS re same (.4); attention to proof chart (1.2).
02/26/2021	Shira Gelfand	SZG	1.6	\$425.00	\$680.00	
03/01/2021	Anna Bostwick	ABX	1.4	\$325.00	\$455.00	Ingest client documents into Nuix.
03/01/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re downloading documents from client.
03/01/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Download production from client re uploading to firm's database
03/01/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins re uploading client documents in preparation for filing
03/01/2021	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting.
03/01/2021	Shira Gelfand	SZG	0.4	\$425.00	\$170.00	Correspondence with client re document production, correspondence with CEG and BKK re same
03/02/2021	Naomi Campusano	NCX	1.2	\$350.00	\$420.00	Prepare plaintiff's production in Nuix and email team re same
03/02/2021	Naomi Campusano	NCX	0.1	\$350.00	\$35.00	Correspondence with team re the documents to be produced.
						Review documents, prep for production, correspondence with BKK and Nuix team re same (1.7); call with EJT re SJ and proof chart (.5).
03/02/2021	Shira Gelfand	SZG	2.2	\$425.00	\$935.00	
03/03/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re sending production to Defendant's counsel.
03/03/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re sending production to Defendant's counsel.
03/03/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re sending production to Defendant's counsel.
03/03/2021	Brian D. Kouassi	BDK	0.7	\$325.00	\$227.50	Prepare Plaintiff's production to Defendant's counsel.
03/03/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Defendant's counsel re Plaintiff's production.
03/03/2021	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Review client transcript and correspondence with SZG re production
						Attention to production of documents (1.2); Review client deposition transcript, correspondence with counsel re document production (.6).
03/03/2021	Shira Gelfand	SZG	1.8	\$425.00	\$765.00	
03/04/2021	Shira Gelfand	SZG	2.9	\$425.00	\$1,232.50	Rowe proof chart drafting (2.2); Review amended Answer (.7).
03/05/2021	Shira Gelfand	SZG	0.3	\$425.00	\$127.50	Correspondence with team, correspondence with counsel.
03/08/2021	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting.
03/08/2021	Shira Gelfand	SZG	0.3	\$425.00	\$127.50	Correspondence with client (.1); correspondence with counsel (.2).
						Create agenda for meeting, correspondence with CEG and MSJ re same (.4); Attention to rough transcript for deposition (.6).
03/11/2021	Shira Gelfand	SZG	1.0	\$425.00	\$425.00	
03/12/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re downloading production from Defendant's counsel
03/12/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re downloading production from Defendant's counsel
03/12/2021	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Download production from Defendant's counsel.
03/12/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with IT re production issues.
03/15/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondence with MSJ re downloading Defendant's production.
03/15/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re changing password for Defendant's FTP account.
03/15/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Resolve technical issues re Defendant's document production website.

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
03/15/2021	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Download Defendant's production.
03/15/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondence with Ringtail Admins re uploading Defendant's production
03/15/2021	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence with client, MSJ.
03/15/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from BK regarding document production.
03/15/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to CEG regarding client meeting and case updates.
03/15/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review 3/12 document production.
03/15/2021	Naomi Campusano	NCX	1.3	\$350.00	\$455.00	Import defendant's production into Nuix and email team re same.
03/16/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to client regarding scheduling and case updates.
03/21/2021	Shira Gelfand	SZG	0.4	\$425.00	\$170.00	Review correspondence re defendant's production and correspondence with client
03/22/2021	Maya S. Jumper	MSJ	2.1	\$475.00	\$997.50	Review transcript for errata and draft correspondence to client regarding verification
03/22/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG and draft response regarding deposition transcript verification and errata
03/22/2021	Shira Gelfand	SZG	2.3	\$425.00	\$977.50	Correspondence with team (.2); review of new document production (.8); attention to U Rowe depo transcript, review (1.3).
03/23/2021	Michaela Dougherty	MDX	0.3	\$350.00	\$105.00	Highlight confidential names in U. Rowe deposition transcript; e-mail correspondence with MSJ
03/23/2021	Michaela Dougherty	MDX	0.2	\$350.00	\$70.00	Update confidential highlights re U. Rowe transcript, and prepare for service to Defendant
03/23/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review verified transcript and draft correspondence to client regarding same.
03/23/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to CEG re confidentiality redactions.
03/23/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to MXD re confidentiality designations.
03/23/2021	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Review transcript for confidentiality designations and draft correspondence to MXD regarding revisions
03/23/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review confidentiality redactions and draft correspondence to MXD regarding zip file to opposing counsel
03/23/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to opposing counsel regarding transcript verification, errata and confidentiality designations
03/23/2021	Shira Gelfand	SZG	0.3	\$425.00	\$127.50	Attention to client errata.
03/25/2021	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Case management meeting with SZG.
03/25/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG and draft response regarding scheduling.
03/29/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding scheduling and draft response.
03/29/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Reschedule weekly check-in.
03/29/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to client regarding scheduling and case updates.
03/30/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with SZG re downloading Defendant's production.
03/30/2021	Brian D. Kouassi	BDK	3.0	\$325.00	\$975.00	Download Defendant's production.
03/30/2021	Brian D. Kouassi	BDK	3.5	\$325.00	\$1,137.50	Transfer document production from Defendant's counsel to O&G database.
03/30/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review and draft correspondence to SZG re case updates and deadlines.
03/30/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Draft correspondence and review correspondence from BK regarding document production
03/30/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to client re document production
03/30/2021	Shira Gelfand	SZG	0.6	\$425.00	\$255.00	Attention to production, correspondence with BXK re upcoming tasks and deadlines
03/31/2021	Anna Bostwick	ABX	0.9	\$325.00	\$292.50	Assist NCX with Nuix import troubleshooting; import defendant production into Nuix
03/31/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review production and draft correspondence to Nuix team re update
03/31/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to Nuix team regarding status update.
03/31/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from BXS regarding staffing.
03/31/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG and draft response regarding staffing.
03/31/2021	Naomi Campusano	NCX	2.3	\$350.00	\$805.00	Import defendant's production into Nuix and email team re same.
03/31/2021	Naomi Campusano	NCX	0.2	\$350.00	\$70.00	Remove old folders in Nuix casebook.
03/31/2021	Shira Gelfand	SZG	0.7	\$425.00	\$297.50	Call with MSJ re production and outstanding tasks (.2); correspondence re staffing (.5);
04/01/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Phone conference with MSJ and SZG re Comparator assignment.
04/01/2021	Daniel Stromberg	DXS	0.3	\$875.00	\$262.50	Assess defendant production technical issues with native excel files, troubleshoot and resolve.
04/01/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review document production and prepare for cal with SZG and BDK
04/01/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference with SZG regarding comparator data and next steps.
04/01/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG to CEG regarding case updates and document production
04/01/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference call with BK regarding comparator data assignment.
04/01/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG regarding comparator data.
04/01/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding deadlines.
04/01/2021	Naomi Campusano	NCX	0.1	\$350.00	\$35.00	Correspondence with DXS re uploading document to Nuix casebook.
04/01/2021	Shira Gelfand	SZG	1.8	\$425.00	\$765.00	Preliminary review of comparator production, correspondence with Nuix admins re same (1.2); Correspondence with BXK and MSJ re assignment (.5); Draft update email to CEG (.1).
04/02/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Phone conference with VXY re case updates.
04/02/2021	Brian D. Kouassi	BDK	4.8	\$325.00	\$1,560.00	Collect comparator data from Defendant's recent production.
04/02/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from BK regarding case assignment and staffing.
04/02/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from BK/SZG regarding comparator data assignment.
04/02/2021	Maya S. Jumper	MSJ	0.7	\$475.00	\$332.50	Review document production.
04/02/2021	Naomi Campusano	NCX	0.2	\$350.00	\$70.00	Assign VXY to Nuix casebook and email team re same.
04/02/2021	Vincent Yang	VXY	3.2	\$325.00	\$1,040.00	Pull and sort comparator discovery documents from Nuix.
04/05/2021	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Finalize comparator data re production from Defendant's counsel
04/05/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondences with MSJ and SZG re comparator data.
04/05/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with VXY re comparator data.
04/05/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with SZG and MSJ re organizing meeting for case overview with VXY.
04/05/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Organize meeting with SZG, MSJ, and VXY re case overview.
04/05/2021	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Phone conference with SZG, MSJ, and VXY re case updates.
04/05/2021	Brian D. Kouassi	BDK	2.4	\$325.00	\$780.00	Compile documents re comparator data.
04/05/2021	Maya S. Jumper	MSJ	0.8	\$475.00	\$380.00	Review data and draft excel template for data project.
04/05/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from SZG regarding scheduling and SJ case strategy.
04/05/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from SZG/BK regarding comparator data.
04/05/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG/client regarding scheduling.
04/05/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review correspondence from opposing counsel and confidentiality designations
04/05/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Conference with BK/SZG/VY regarding comparator data assignment.
04/05/2021	Shira Gelfand	SZG	1.0	\$425.00	\$425.00	Email update CEG and MSJ re upcoming tasks (.4); Meeting with paralegals re data entry and comparator assignment (.5); correspondence with client (.1).
04/05/2021	Vincent Yang	VXY	0.8	\$325.00	\$260.00	Pull and sort comparator discovery documents from Nuix.
04/05/2021	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Telephone conference with MSJ, SXG, and BDK re case overview and comparator data project
04/05/2021	Vincent Yang	VXY	3.2	\$325.00	\$1,040.00	Compile Excel spreadsheet re comparator data.
04/06/2021	Brian D. Kouassi	BDK	1.8	\$325.00	\$585.00	Update comparator data folders re Ben Wilson, Evren Eryurek and Nicholas Harteau
04/06/2021	Vincent Yang	VXY	4.2	\$325.00	\$1,365.00	Further compile Excel spreadsheet re comparator data.
04/07/2021	Brian D. Kouassi	BDK	3.2	\$325.00	\$1,040.00	Update comparator data folders re Ben Wilson, Evren Eryurek and Nicholas Harteau
04/07/2021	Brian D. Kouassi	BDK	5.1	\$325.00	\$1,657.50	Review comparator data from Defendant's production and upload data in Plaintiff's spreadsheet
04/07/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding prep for client call and draft response
04/07/2021	Naomi Campusano	NCX	0.7	\$350.00	\$245.00	Upload missing document to Nuix casebook and email team re same.
04/07/2021	Vincent Yang	VXY	2.0	\$325.00	\$650.00	Further compile Excel spreadsheet re comparator data.
04/08/2021	Brian D. Kouassi	BDK	1.8	\$325.00	\$585.00	Finalize and review comparator data from Defendant's production and upload data in Plaintiff's spreadsheet

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
04/08/2021	Brian D. Kouassi	BDK	1.3	\$325.00	\$422.50	Download additional documents re defendant's counsel.
04/08/2021	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Edit comparators data list with new data.
04/08/2021	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Correspondences with MSJ, SZG, and VXY re comparator data.
04/08/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re FTP to client.
04/08/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondence with MSJ re edits to the comparator data sheet.
04/08/2021	Cara E. Greene	CEG	0.6	\$950.00	\$570.00	Conference with SZG re call with client (.2); case management meeting with SZG and MSJ re summary judgment, comparator analysis (.4).
04/08/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Conference call with SZG/client regarding case update on comparator data and sj
04/08/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review correspondence and data spreadsheet from BK/VY and draft response regarding next steps.
04/08/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review file and draft correspondence to BK regarding next steps.
04/08/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from SZG regarding meeting agenda and draft response regarding updates.
04/08/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with CEG/SZG regarding case updates and next steps on summary judgment.
04/08/2021	Shira Gelfand	SZG	2.7	\$425.00	\$1,147.50	Prep for call with client, call with client (.6); prepare agenda for team meeting (.4); case mgmt meeting with CEG and MSJ (.5); review comparator data, attention of FTP of comparator production to client (1.2).
04/08/2021	Vincent Yang	VXY	2.0	\$325.00	\$650.00	Download production re comparator data from Nuix; send re same via FTP to Named Plaintiff U. Rowe
04/12/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review data production regarding comparator compensation data and draft response to SZG
04/12/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding schedule to client.
04/12/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from client regarding scheduling.
04/12/2021	Shira Gelfand	SZG	0.5	\$425.00	\$212.50	Correspondence with team and client.
04/13/2021	Shira Gelfand	SZG	3.6	\$425.00	\$1,530.00	Correspondence with MSJ (.2); correspondence with BXX re metadata assignment (.1); Continue drafting proof chart, review documents and deposition transcripts re same (3.2); correspondence with client (.1).
04/14/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with KXD re metadata assignment.
04/14/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Phone conference with KXD re metadata assignment.
04/14/2021	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Correspondences with SZG re metadata assignment.
04/14/2021	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Compile documents and data re metadata assignment.
04/14/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference call with SZG regarding comparator analysis and next steps.
04/14/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review SJ proof chart.
04/14/2021	Naomi Campusano	NCX	0.2	\$350.00	\$70.00	Video conference with BXS re Nuix search.
04/14/2021	Shira Gelfand	SZG	3.0	\$425.00	\$1,275.00	Continue drafting proof chart for SJ equal pay claims (2.8); correspondence with BXX re metadata assignment (.2)
04/15/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Phone conference with MSJ, SZG and VXY re metadata and upcoming assignments.
04/15/2021	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting re SJ.
04/15/2021	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Case management meeting with SZG.
04/15/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review file and proof chart in preparation for team call
04/15/2021	Shira Gelfand	SZG	5.2	\$425.00	\$2,210.00	Team meeting with CEG and MSJ (.5); Meeting with paralegals re assignment (.4); Prepare litigation committee memo, update proof chart, conduct research re same (4.3).
04/15/2021	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Telephone conference with MSJ, SXG, and BDK re production metadata and binder tasks
04/19/2021	Brian D. Kouassi	BDK	0.7	\$325.00	\$227.50	Correspondences with MSJ re compiling a list of names missing data from defendant's production
04/19/2021	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Compile a list of names of comparators missing data from defendant's production
04/19/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondences with SZG and VXY re comparator data.
04/19/2021	Cara E. Greene	CEG	1.4	\$950.00	\$1,330.00	Conference with WNO, KP re summary judgment strategy; case management meeting with SZG, MSJ; review and edit litigation memo.
04/19/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review litigation committee memo and circulate revisions to SZG/CEG.
04/19/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from KP regarding litigation committee meeting and logistics
04/19/2021	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Review file; draft correspondence to opposing counsel regarding comparator data
04/19/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with WNO/KP/CEG/SZG regarding summary judgment strategy.
04/19/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Calendar follow up call regarding litigation strategy.
04/19/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from opposing counsel regarding comparator data and draft correspondence to BK regarding document pull.
04/19/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from CEG regarding next steps regarding summary judgment and draft response.
04/19/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to SZG regarding work allocation and timeline
04/19/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to CEG regarding drafting and review schedule.
04/19/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from CEG regarding pre-motion letter filing and local rules
04/19/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review file and local rules regarding pre-motion letter filing
04/19/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from BK and draft response regarding follow up questions
04/19/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from CEG regarding comparator data and draft response.
04/19/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG regarding comparator data and draft response.
04/19/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review SZH correspondence regarding responses to WNO questions regarding case background.
04/19/2021	Shira Gelfand	SZG	5.7	\$425.00	\$2,422.50	Prep for litigation committee meeting, attend meetings (1.3); correspondence with team re outstanding tasks (.3); Draft pre-motion letter, conduct research and review documents re same (3.8); correspondence with paralegals re comparator compensation spreadsheet (.3).
04/19/2021	Vincent Yang	VXY	1.3	\$325.00	\$422.50	Create Excel spreadsheet re comparator compensation yearly data.
04/20/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with MSJ re missing offer letters from Defendant's production.
04/20/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Review documents from Defendant's production re missing documents from their production
04/20/2021	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Status call with client and prepare for same.
04/20/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Conference regarding SZG/CEG regarding client conversation.
04/20/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from BK regarding comparator data.
04/20/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review comparator production and draft correspondence to opposing counsel regarding incomplete document production.
04/20/2021	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Conduct legal research and draft correspondence to CEG regarding stipulation of dismissal
04/20/2021	Shira Gelfand	SZG	4.1	\$425.00	\$1,742.50	Call with client (.5); Correspondence with opposing counsel re comparator production (.3); continue drafting pre motion SJ letter and conduct research re same (3.2); correspondence with paralegals re tasks (.1).
04/20/2021	Vincent Yang	VXY	0.8	\$325.00	\$260.00	Pull comparator compensation data; save re same to case file.
04/21/2021	Shira Gelfand	SZG	2.3	\$425.00	\$977.50	Review MSJ draft correspondence (.2); Continue research and drafting pre-motion SJ letter (2.1)
04/22/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Phone conference with SZG re deposition exhibits.
04/22/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Phone conference with VXY re deposition exhibits metadata.
04/22/2021	Brian D. Kouassi	BDK	3.4	\$325.00	\$1,105.00	Finalize deposition exhibits metadata.
04/22/2021	Shira Gelfand	SZG	1.4	\$425.00	\$595.00	Continue drafting pre-motion letter (1.2); call with BXX (.2).
04/22/2021	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Telephone conference with BDK re document metadata review.
04/23/2021	Brian D. Kouassi	BDK	1.8	\$325.00	\$585.00	Review deposition exhibits metadata.
04/23/2021	Shira Gelfand	SZG	1.4	\$425.00	\$595.00	Correspondence with counsel and review of documents (.8); Review MSJ edits to brief (.6)
04/23/2021	Vincent Yang	VXY	1.6	\$325.00	\$520.00	Review document production metadata re deposition index.
04/25/2021	Brian D. Kouassi	BDK	2.7	\$325.00	\$877.50	Review and revise of deposition exhibits re metadata.
04/25/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG and VXY re deposition exhibits metadata.
04/26/2021	Brian D. Kouassi	BDK	1.7	\$325.00	\$552.50	Prepare deposition exhibits re preparation for binders.
04/26/2021	Brian D. Kouassi	BDK	2.0	\$325.00	\$650.00	Update Litigation Binder with previous and recent filing from the court

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Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
04/26/2021	Cara E. Greene	CEG	1.4	\$950.00	\$1,330.00	Draft correspondence to opposing counsel re stipulation on affirmative defenses (.2); review and edit SJ pre-motion letter (1.2).
04/26/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from CEG to opposing counsel regarding stipulation
04/26/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from opposing counsel to CEG regarding response to stipulation request
04/26/2021	Shira Gelfand	SZG	2.5	\$425.00	\$1,062.50	Correspondence with counsel (.2); edit and supplement pre-motion SJ letter, research re same (2.3)
04/27/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with SZG re deposition metadata.
04/27/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with SZG re phone conference re deposition metadata.
04/27/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Organize phone conference with SZG and VXY re deposition metadata.
04/27/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Phone conference with SZG and VXY re deposition metadata.
04/27/2021	Brian D. Kouassi	BDK	4.9	\$325.00	\$1,592.50	Finalize deposition exhibits metadata.
04/27/2021	Brian D. Kouassi	BDK	1.3	\$325.00	\$422.50	Update Litigation binder re previous and recent filings from the court
04/27/2021	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Review and finalize letter for filing, correspondence with opposing counsel re stipulations
04/27/2021	Shira Gelfand	SZG	0.8	\$425.00	\$340.00	Correspondence with client (.2); call with BXX re metadata (.2); review CEG edits to pre-motion SJ letter (.4)
04/27/2021	Vincent Yang	VXY	1.9	\$325.00	\$617.50	Review and update deposition metadata spreadsheet.
04/28/2021	Brian D. Kouassi	BDK	1.2	\$325.00	\$390.00	Download production from Defendant's counsel.
04/28/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with SZG re downloading Defendant's production.
04/28/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with Ringtail admins re uploading documents.
04/28/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with SWG re deposition exhibits metadata.
04/28/2021	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Revise re SZG's edits and finalize deposition exhibits metadata.
04/28/2021	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Prepare Pre-Motion letter for upcoming filing to the court
04/28/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	File Pre-Motion Letter to the court re Plaintiff's Proposed Motion for Partial Summary Judgement
04/28/2021	Brian D. Kouassi	BDK	1.3	\$325.00	\$422.50	Update litigation binder re filings to court.
04/28/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Update case database with recent filings from the court.
04/28/2021	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Follow-up with opposing counsel re stipulation; review and approve pre-motion letter for filing
04/28/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from opposing counsel and SZG/BK regarding production
04/28/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review docket text and draft correspondence to BXS/BK regarding filing.
04/28/2021	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Review opposing counsel pre-motion letter regarding summary judgment.
04/28/2021	Naomi Campusano	NCX	1.0	\$350.00	\$350.00	Import defendant's production into Nuix and email team re same.
04/28/2021	Shira Gelfand	SZG	3.4	\$425.00	\$1,445.00	Finalize pre-motion letter, correspondence and attention to filing (2.7); attention and review of defendant's filing (.6); correspondence with opposing counsel (.2).
04/28/2021	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Perform final review on deposition metadata.
04/29/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Update case database with recent filings from the court.
04/29/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with SZG re updating case schedule.
04/29/2021	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Case management meeting with SZG.
04/29/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with CEG/SZG regarding case updates and next steps regarding summary judgment.
04/29/2021	Shira Gelfand	SZG	2.1	\$425.00	\$892.50	Case management meeting with CEG and MSJ (.5); Call with MSJ (.2); Review of pre-motion letter and begin drafting response (1.4).
04/30/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with SZG re deposition exhibits.
04/30/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Revise metadata re deposition exhibits.
04/30/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Phone conference with MSJ re upcoming assignments.
04/30/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re upcoming assignments.
04/30/2021	Brian D. Kouassi	BDK	2.2	\$325.00	\$715.00	Revise Litigation Binder.
04/30/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Conference call with SZG regarding case updates and summary judgment prep.
04/30/2021	Shira Gelfand	SZG	7.1	\$425.00	\$3,017.50	Draft response to Google's pre-motion letter, conduct research re same (5.8); Correspondence re and attention to depo exhibit binder and index (1.1); Call with BXS and MSJ (.2).
04/30/2021	Vincent Yang	VXY	2.1	\$325.00	\$682.50	Finalize deposition master index.
05/02/2021	Brian D. Kouassi	BDK	3.1	\$325.00	\$1,007.50	Update Litigation Binder.
05/03/2021	Brian D. Kouassi	BDK	1.3	\$325.00	\$422.50	Update litigation binder.
05/03/2021	Maya S. Jumper	MSJ	2.3	\$475.00	\$1,092.50	Review draft response to Defendant's motion for leave to file summary judgment and revise.
05/04/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with SZG re update dating case deadlines.
05/04/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re updating case deadlines.
05/04/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Update case deadline and send out to team.
05/04/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Update Docket folder re recent filings to the court.
05/04/2021	Brian D. Kouassi	BDK	3.3	\$325.00	\$1,072.50	Update litigation binder re recent updates from the court.
05/04/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to BK regarding calendaring.
05/04/2021	Shira Gelfand	SZG	0.8	\$425.00	\$340.00	Review court order, correspondence with team re conference.
05/05/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with SZG re litigation and deposition exhibits binder
05/05/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with SZG re upcoming filing to the court today
05/05/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Prepare proper folders in the Y-Drive for upcoming filing to the court
05/05/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondences with VXY re deposition exhibits binder.
05/05/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with VXY re deposition exhibits binder.
05/05/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Review finalize deposition exhibits binder.
05/05/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with SZG re deposition excerpts re Rowe's transcript.
05/05/2021	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Pull deposition excerpts re upcoming letter to the court.
05/05/2021	Brian D. Kouassi	BDK	5.1	\$325.00	\$1,657.50	Compile documents for Litigation Binder.
05/05/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Edit and finalization re response letter to Def's Pre-Motion letter.
05/05/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	File response to Defendant's Letter Motion re Summary Judgement.
05/05/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Update docket re recent filing to the court.
05/05/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with SZG re update case deadlines.
05/05/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Update case deadlines re new dates from the court.
05/05/2021	Cara E. Greene	CEG	1.4	\$950.00	\$1,330.00	Review and edit pre-SJ letter to court, research same.
05/05/2021	Shira Gelfand	SZG	4.2	\$425.00	\$1,785.00	Correspondence with paralegals re binders and review of index (.7); Finalize and edit letter response, attention to filing, correspondence with team and research re same (3.6).
05/05/2021	Vincent Yang	VXY	1.8	\$325.00	\$585.00	Finalize master depositions exhibits binder.
05/06/2021	Brian D. Kouassi	BDK	3.0	\$325.00	\$975.00	Update litigation binder.
05/06/2021	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Telephone call with client and prepare for same.
05/06/2021	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting.
05/06/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with CEG/SZG and client regarding case updates and next steps.
05/06/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Conference with CEG/SZG regarding case updates and next steps.
05/06/2021	Shira Gelfand	SZG	1.7	\$425.00	\$722.50	Review Defendant's response letter (.8); call with client (.4); call with MSJ (.3); prepare agenda for team meeting (.2).
05/07/2021	Brian D. Kouassi	BDK	4.0	\$325.00	\$1,300.00	Update litigation binder.
05/07/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference with SZG regarding case updates and prep for summary judgment.
05/07/2021	Shira Gelfand	SZG	1.2	\$425.00	\$510.00	Edit and supplement proof chart.
05/10/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with VXY and SZG re binder for Pre-Conference binder
05/10/2021	Brian D. Kouassi	BDK	2.0	\$325.00	\$650.00	Prepare pre-conference motion binder re partial summary judgement.

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
05/10/2021	Brian D. Kouassi	BDK	1.6	\$325.00	\$520.00	Pull documents for litigation binder.
05/10/2021	Shira Gelfand	SZG	0.5	\$425.00	\$212.50	Correspondence with team re outstanding tasks (.4); correspondence with client (.1).
05/11/2021	Brian D. Kouassi	BDK	1.8	\$325.00	\$585.00	Update Litigation Binder re new documents from the court.
05/11/2021	Shira Gelfand	SZG	2.6	\$425.00	\$1,105.00	Edit and supplement Summary judgment proof chart, correspondence with MSJ re same
05/11/2021	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Telephone conference with BDK re litigation binder project
05/12/2021	Shira Gelfand	SZG	3.2	\$425.00	\$1,360.00	Edit to proof chart, review of documents.
05/17/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review summary judgment proof chart.
05/17/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG/CEG regarding scheduling.
05/17/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG regarding client call.
05/17/2021	Shira Gelfand	SZG	3.1	\$425.00	\$1,317.50	Correspondence with team (.2); correspondence with client (.1); Continue drafting proof chart and review of documents (2.8).
05/18/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondences with SZG re Litigation Binder.
05/18/2021	Brian D. Kouassi	BDK	5.6	\$325.00	\$1,820.00	Finalize Litigation Binder with submissions from the court.
05/18/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with SZG re explanation of the finalization of the Litigation Binder
05/24/2021	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Case management meeting and prepare for same.
05/24/2021	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Correspondence with client and CEG.
05/26/2021	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Review Court filing (.1); attention to court transcript bill (.1)
05/27/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondences with SZG re cases cited in letters for Proposed Motion for Partial Summary
05/27/2021	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Prepare cases cited in letters for Proposed Motion for Partial Summary for SZG's review
05/27/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondence with SZG re updating case schedule.
05/27/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Update case schedule with new deadline.
05/27/2021	Cara E. Greene	CEG	2.9	\$950.00	\$2,755.00	Prepare for court conference (1.8); court conference re SJ (.6); follow-up with opposing counsel, and internally, re Gorenstein as mediator (.4); correspondence with reporter (.1).
05/27/2021	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Conference with client re court conference.
05/27/2021	Maya S. Jumper	MSJ	1.0	\$475.00	\$475.00	Attend pre-motion conference.
05/27/2021	Shira Gelfand	SZG	3.3	\$425.00	\$1,402.50	Prep for court conference (1.8); Court conference (.7); Call with client (.6); correspondence with BXK (.2)
06/01/2021	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Telephone call with K. Gage re mediation.
06/03/2021	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Reorganization of case file database.
06/03/2021	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Telephone call with SZG re mediation strategy, communications with client
06/03/2021	Shira Gelfand	SZG	0.8	\$425.00	\$340.00	Call with CEG (.5); Draft correspondence with client (.3).
06/04/2021	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence with client re mediation.
06/04/2021	Shira Gelfand	SZG	0.3	\$425.00	\$127.50	Correspondence with client.
06/07/2021	Cara E. Greene	CEG	0.9	\$950.00	\$855.00	Correspondence with K. Gage re mediation (.1); telephone call with client re same (.8)
06/07/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with CEG/SZG and client regarding case updates and next steps regarding mediation.
06/07/2021	Shira Gelfand	SZG	1.1	\$425.00	\$467.50	Call with client (.2); correspondence with team (.2); correspondence with counsel and review of draft letter, reiew filing (.7).
06/09/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from opposing counsel regarding meet and confer on mediation scheduling g
06/09/2021	Shira Gelfand	SZG	1.1	\$425.00	\$467.50	Correspondence with client, call with counsel and Judge's clerk; correspondence with team re Judge Fox, research re same.
06/10/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Update case database re recent documents from the court.
06/10/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG regarding scheduling.
06/10/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review amended court order and draft response to SZG.
06/10/2021	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Correspondence with team re scheduling.
06/11/2021	Shira Gelfand	SZG	0.4	\$425.00	\$170.00	Correspondence with team and review re outstanding tasks.
06/14/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Update case outline with new dates from the court.
06/14/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Save recent documents from the court.
06/14/2021	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Review magistrate referral, correspondence with MSJ re same, review order re settlement conference and correspondence with opposing counsel re adjournment.
06/14/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review file.
06/14/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review court order regarding referral to magistrate judge for mediation.
06/14/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence and draft correspondence to opposing counsel regarding status of mediation scheduling
06/14/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from opposing counsel and draft correspondence to CEG regarding requested extension of mediation date.
06/14/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from CEG and draft response to opposing counsel regarding mediation date
06/14/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Reschedule client call.
06/14/2021	Shira Gelfand	SZG	0.5	\$425.00	\$212.50	Correspondence with client, review court order, correspondence with team and counsel
06/15/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Reschedule meeting with CEG/client.
06/15/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from BK regarding new calendaring protocol and draft response
06/15/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to client regarding availability for mediation dates
06/15/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to CEG/SZG regarding mediation scheduling.
06/15/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to CEG regarding mediation availability.
06/15/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review correspondence from opposing counsel and letter to court regarding request for new mediation date
06/15/2021	Shira Gelfand	SZG	0.5	\$425.00	\$212.50	Correspondence re calendaring deadlines; correspondence with counsel re mediation dates; review filed joint letter
06/16/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Save recent docket document to case database.
06/17/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from BK and draft response regarding calendaring.
06/17/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to client regarding rescheduling and case update.
06/17/2021	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Review Court order.
06/21/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review court order regarding rescheduled mediation date.
06/21/2021	Shira Gelfand	SZG	0.6	\$425.00	\$255.00	Correspondence with team re damage analysis (.2); review Judge order (.4).
06/22/2021	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence re damages analysis.
06/22/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with CEG/client regarding mediation and next steps.
06/22/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to SZG regarding calendar update.
06/22/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to CEG regarding damages calculations.
06/22/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Schedule check-in with SZG regarding damages.
06/22/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to CEG regarding meeting to discuss damages workup.
06/22/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from CEG/SZG regarding individual comparator damages calculations
06/22/2021	Shira Gelfand	SZG	1.7	\$425.00	\$722.50	Correspondence with team re damages calculations (.2), review comparator data (1.5).
06/24/2021	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with team.
06/28/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review client damages and draft correspondence to SZGr regarding calculations.
06/28/2021	Shira Gelfand	SZG	3.7	\$425.00	\$1,572.50	Correspondence with client; review of documents and prepare damages analysis for mediation
06/29/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Conference call with SZG regarding damages analysis and probability chart.
06/29/2021	Shira Gelfand	SZG	2.7	\$425.00	\$1,147.50	Continue damages analysis for 4 OCTO comparators and Breslow; call with MSJ re same (2.6); correspondence with client (.1).
07/01/2021	Shira Gelfand	SZG	0.3	\$425.00	\$127.50	Review judge rules re settlement conference mediation statement and correspondence with MSJ re same.
07/02/2021	Shira Gelfand	SZG	1.2	\$425.00	\$510.00	Continue preparing damages analysis.
07/06/2021	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence with SZG re comparator calculations.

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
07/06/2021	Shira Gelfand	SZG	6.6	\$425.00	\$2,805.00	Edit and supplement damages calculation (1.6); Review Judge Fox's rules and relevant documents, begin drafting mediation statement (4.8); prepare meeting agenda (.2); correspondence with CEG, correspondence with client re check in (.2).
07/07/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review damages analysis.
07/07/2021	Shira Gelfand	SZG	2.2	\$425.00	\$935.00	Correspondence with team (.1); continue drafting mediation statement, complete attendance form (2.1)
07/08/2021	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Case management meeting.
07/08/2021	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Conference call with CEG/SZG regarding mediation prep and damages analysis.
07/08/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG regarding meeting agenda.
07/08/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review correspondence from SZG regarding updated damages analysis.
07/08/2021	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Review correspondence from SZG regarding draft pre-conference letter and review letter
07/08/2021	Shira Gelfand	SZG	3.3	\$425.00	\$1,402.50	Rowe team meeting, edit and supplement mediation statement and send to MSJ, edit and supplement damages chart.
07/09/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review correspondence from SZG regarding notes from team meeting and updated damages analysis.
07/09/2021	Maya S. Jumper	MSJ	2.2	\$475.00	\$1,045.00	Review file and draft probability damages analysis.
07/09/2021	Shira Gelfand	SZG	2.4	\$425.00	\$1,020.00	Review of documents for information on compensation at hire (.8); edit and supplement damages calculation (1.6)
07/12/2021	Maya S. Jumper	MSJ	2.2	\$475.00	\$1,045.00	Review file; draft damages probability table.
07/12/2021	Shira Gelfand	SZG	1.2	\$425.00	\$510.00	Review damages probability chart, correspondence with team re same.
07/13/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from CEG/SZG regarding client call rescheduling
07/13/2021	Shira Gelfand	SZG	0.8	\$425.00	\$340.00	Review of damages analysis, correspondence with client, correspondence with team.
07/14/2021	Shira Gelfand	SZG	0.3	\$425.00	\$127.50	Call with CEG and correspondence with client.
07/15/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with SZG re Comparator Data.
07/15/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Send Comparator Data to SZG for review.
07/15/2021	Cara E. Greene	CEG	1.5	\$950.00	\$1,425.00	Work on probability charts, telephone call with client in preparation for mediation
07/15/2021	Shira Gelfand	SZG	2.1	\$425.00	\$892.50	Edit and supplement damages chart and probability analysis, correspondence with CEG and MSJ re same (1.8); call with client (.2); correspondence with CEG (.1).
07/16/2021	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Prepare for mediation.
07/16/2021	Shira Gelfand	SZG	5.0	\$425.00	\$2,125.00	Attention to equity comparator chart (3.8); review documents and deposition testimony re same(1.2)
07/19/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with MSJ re Comparator Data.
07/19/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Send comparator data to MSJ for review.
07/19/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Save recent documents from the court.
07/19/2021	Maya S. Jumper	MSJ	3.4	\$475.00	\$1,615.00	Review file and revise damages analysis.
07/19/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review calendars and schedule meet and confer with opposing counsel regarding mediation
07/19/2021	Shira Gelfand	SZG	0.8	\$425.00	\$340.00	Prepare agenda for team meeting (.2); correspondence with client (.1); correspondence with team (.2); review filing from court (.3).
07/20/2021	Cara E. Greene	CEG	1.7	\$950.00	\$1,615.00	Finish preparing damages probability chart and mediation prep session with client
07/20/2021	Maya S. Jumper	MSJ	3.3	\$475.00	\$1,567.50	Review and revise pre-conference mediation letter.
07/20/2021	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Conference call with CEG/SZG and client regarding mediation demand and damages calculations
07/20/2021	Shira Gelfand	SZG	2.6	\$425.00	\$1,105.00	Call with client (.8); prep damages chart (1.8).
07/21/2021	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence with client re probability chart.
07/21/2021	Maya S. Jumper	MSJ	1.5	\$475.00	\$712.50	Review and revise pre-conference letter.
07/21/2021	Shira Gelfand	SZG	1.1	\$425.00	\$467.50	Correspondence with client; review updated probability chart; review mediation statement
07/22/2021	Cara E. Greene	CEG	0.7	\$950.00	\$665.00	Meet and confer with opposing counsel and prepare for same.
07/22/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Attend M&C with opposing counsel regarding pre-mediation conference.
07/22/2021	Shira Gelfand	SZG	1.3	\$425.00	\$552.50	Prep for meet and confer; meet and confer with counsel; review MSJ edits to mediation statement
07/23/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG regarding mediation attendance sheet and draft response.
07/23/2021	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Edit to attendance form for Monday filing.
07/26/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with MSJ re ordering transcript from phone conference with court
07/26/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondences with JLM re ordering transcript from the court
07/26/2021	Cara E. Greene	CEG	4.0	\$950.00	\$3,800.00	Review and edit pre-settlement conference letter (1.6); telephone call with opposing counsel (.2); finalize and file letter (.4); prepare for mediation by reviewing case materials, transcripts (1.8).
07/26/2021	Maya S. Jumper	MSJ	0.8	\$475.00	\$380.00	Review and revise pre-conference letter.
07/26/2021	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Finalize pre-conference letter and attendance form and circulate to mediator
07/26/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Conference call with CEG/SZG and opposing counsel regarding settlement demand response.
07/26/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to accounting for fees and costs.
07/26/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from BK and draft response re transcript request.
07/26/2021	Shira Gelfand	SZG	2.9	\$425.00	\$1,232.50	Edit and finalize pre-conference letter, conduct research and review file re same (2.4); correspondence with team (.2); correspondence with client (.1); meet and confer with counsel (.2).
07/27/2021	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Telephone call with client.
07/27/2021	Shira Gelfand	SZG	0.4	\$425.00	\$170.00	Call with client.
07/28/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with JLM re status of transcript ordered from the court.
07/29/2021	Cara E. Greene	CEG	2.8	\$950.00	\$2,660.00	Prepare for and attend settlement conference with Judge Fox (2.3); case management meeting (.5).
07/29/2021	Shira Gelfand	SZG	4.2	\$425.00	\$1,785.00	Prep for settlement conference and attend settlement conference (2.9); case management meeting (.5); review upcoming deadlines and prepare timeline re same. (.8).
07/30/2021	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Review court transcript re personal information about client
07/30/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Save court transcript to case database.
07/30/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Correspondence with MSJ re reviewing court transcript.
08/02/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with MSJ re transcript from court and BDK's review.
08/02/2021	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Telephone call with opposing counsel and prepare for same
08/02/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from CEG and opposing counsel regarding referral to magistrate and next steps regarding summary judgment.
08/02/2021	Shira Gelfand	SZG	1.3	\$425.00	\$552.50	Review Court order re upcoming joint letter (.5); prepare agenda for team meeting (.2); Call with counsel (.3); correspondence with MSJ and CEG (.1); correspondence with client (.2).
08/03/2021	Cara E. Greene	CEG	0.6	\$950.00	\$570.00	Telephone call with client, correspondence with opposing counsel re stipulation
08/03/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding summary judgment proposal.
08/03/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference with client regarding next steps and case updates.
08/03/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review file and draft correspondence to SZG regarding transcript request.
08/03/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from BXS and regarding staffing.
08/03/2021	Shira Gelfand	SZG	2.1	\$425.00	\$892.50	Call with client (.5); draft reply to Defendant's proposed stipulation re SJ (.8); review comparator compensation data re same (.3); call with CEG (.1); correspondence with MSJ (.1); review of transcript from pre-motion conference hearing (.1); correspondence with BKK (.2).
08/04/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondences with MSJ re requesting Certificate of Good Standing.
08/04/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondences with JLM re requesting Certificate of Good Standing.
08/04/2021	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Draft Certificate of Good Standing and pull needed information for upcoming request
08/04/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondences with BXS re MSJ's Certificate of Good Standing.
08/04/2021	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence re stipulations.
08/04/2021	Gregory S. Chiarello	GSC	0.2	\$800.00	\$160.00	Conference with CEG.

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Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
08/04/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from CEG and draft response regarding call.
08/04/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Call CEG regarding case updates and next steps.
08/04/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to CEG/SZG regarding strategy call regarding summary judgment.
08/04/2021	Shira Gelfand	SZG	1.3	\$425.00	\$552.50	Correspondence with counsel (.2); call with MSJ (.2); call with CEG (.1); correspondence with team re summary judgment strategy (.1); review of filings and documents re same (.7).
08/05/2021	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Edit letter to opposing counsel, correspondence with SZG re response
08/05/2021	Maya S. Jumper	MSJ	1.4	\$475.00	\$665.00	Review file and draft correspondence to CEG regarding analysis of non-OCTO comparators
08/05/2021	Shira Gelfand	SZG	1.4	\$425.00	\$595.00	Draft correspondence with counsel (.6); correspondence with lit comm; correspondence with CEG (.1); recap with MSJ and review file re comparators (.7).
08/06/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with SZG re Joint Status Report to the Court.
08/06/2021	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Review and edit correspondence with opposing counsel.
08/06/2021	Shira Gelfand	SZG	2.1	\$425.00	\$892.50	Call with CEG (.2); Edit and finalize joint letter to court, review court rules re same (1.4); correspondence with MSJ and GSC re summary judgment (.3); review court filing (.4).
08/09/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Phone conference with MSJ, SZG, and VXY re case updates.
08/09/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with SZG re upcoming case update meeting with VXY and MSJ.
08/09/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with SZG re drafting a notice of dismissal.
08/09/2021	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Correspondences with JLM re correct process of filing notice of dismissal or stipulation of dismissal
08/09/2021	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Draft multiple versions of notice of dismissal and stipulation of dismissal
08/09/2021	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Finalize draft Stipulation of Dismissal.
08/09/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Update case database with new documents from the court.
08/09/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with SZG re Summary Judgement Optimal Timeline.
08/09/2021	Brian D. Kouassi	BDK	0.6	\$325.00	\$195.00	Review Summary Judgement Optimal Timeline for upcoming summary judgement for case.
08/09/2021	Gregory S. Chiarello	GSC	0.6	\$800.00	\$480.00	Telephone call with SZG, MJ re MSJ preparation and schedule (.4); correspondence with SZG, MJ re stipulation of dismissal (.2).
08/09/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with SZG/GXC regarding case updates and next steps.
08/09/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Conference call with SZG regarding paralegal preparation for summary judgment filing
08/09/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding correspondence to client.
08/09/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Conference call with SZG/GCC regarding case updates and next steps.
08/09/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Conference with SZG regarding case strategy and summary judgment work allocation.
08/09/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Conference call with SZG/BK/VXY regarding summary judgment filing prep.
08/09/2021	Shira Gelfand	SZG	3.1	\$425.00	\$1,317.50	Review Judge's rules, prep agenda for team meeting (.5); team meeting with GSC and MSJ (.5); call with MSJ; call with MSJ and paralegals re SJ strategy and workflow (.2); attention to status of proof chart, court order, draft of stip of dismissal (1.9).
08/09/2021	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Calendar motion for summary judgment briefing deadlines and save order re same to case file
08/09/2021	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Telephone conference with MSJ, SXG, and BDK re motion for summary judgment
08/10/2021	Gregory S. Chiarello	GSC	0.2	\$800.00	\$160.00	Review draft stipulation (.1); correspondence with team re same (.1).
08/10/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from SZG/BK regarding stipulation of dismissal, review and draft response
08/10/2021	Shira Gelfand	SZG	0.4	\$425.00	\$170.00	Edit joint stipulation, correspondence with GSC and MSJ re same.
08/11/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with MSJ re new voicemail from the court re MSJ's COG.
08/11/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Listen to voicemail re MSJ's COG.
08/11/2021	Gregory S. Chiarello	GSC	0.2	\$800.00	\$160.00	Correspondence with team re stipulation of dismissal.
08/11/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review stipulation of dismissal and revise.
08/11/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review correspondence from opposing counsel/SZG/GCC and draft response regarding court order
08/11/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Correspondence with SZG regarding case updates and strategy.
08/11/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to SZG regarding meet and confer discussions.
08/11/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from opposing counsel regarding comments to proposed stipulation
08/11/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference call with SDNY regarding application for COS and draft correspondence to BXK regarding same
08/11/2021	Shira Gelfand	SZG	2.6	\$425.00	\$1,105.00	Correspondence with counsel(.4); edit and supplement stipulation (.3); correspondence with MSJ re case updates (.3); continue drafting proof chart for EPL retaliation claim (1.6).
08/12/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Update docket folder with new documents from the court.
08/12/2021	Gregory S. Chiarello	GSC	1.1	\$800.00	\$880.00	Zoom call with client, SZG, MJ (.5); conferences with SZJ, MJ (.5); review extension request (.1)
08/12/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review J. Schofield's rules.
08/12/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft motion for extension of deadline to dismissal TVII/Federal EPA claims
08/12/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to opposing counsel regarding consent for extension.
08/12/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Conference call with SZG regarding case strategy and next steps.
08/12/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Conference call with SZG/GCC regarding case strategy and next steps.
08/12/2021	Maya S. Jumper	MSJ	0.7	\$475.00	\$332.50	Conference call with client regarding case updates, proposed stipulation and dismissal of federal claims
08/12/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review file and prepare for client call.
08/12/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to BK/VXY regarding filing.
08/12/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review and revise proposed stipulation of dismissal and draft response to SZG/GCC regarding case updates.
08/12/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to opposing counsel regarding consent for extension.
08/12/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from opposing counsel and draft response to VXY regarding extension motion filing
08/12/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review and monitor filing.
08/12/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from JCS and draft correspondence to JCS regarding correspondence with PC
08/12/2021	Shira Gelfand	SZG	2.4	\$425.00	\$1,020.00	Prep for call and call with client (.8); call with GSC re case strategy (.4); call with MSJ re case strategy and next steps (.2); correspondence with CEG (.2); attention to extension of time (.3); correspondences with team (.5).
08/12/2021	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Finalize and file letter motion for extension of time
08/13/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Save recent documents from the court to firm database.
08/13/2021	Gregory S. Chiarello	GSC	1.1	\$800.00	\$880.00	Correspondence with client (.4); correspondence with team (.3); correspondence and conference with CEG (.4)
08/13/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from SZG and draft response to SZG/GCC regarding same.
08/13/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Draft proposed correspondence to client regarding follow up call
08/13/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from GCC to client regarding next steps.
08/13/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review Court order regarding extension request.
08/13/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from client regarding follow up request.
08/13/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review court order regarding extension of time to file voluntary dismissal of claims
08/13/2021	Shira Gelfand	SZG	0.6	\$425.00	\$255.00	Correspondence with team and client re summary judgment.
08/13/2021	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Calendar updated motion to dismiss deadline.
08/16/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with SZG re postponing weekly meeting.
08/16/2021	Gregory S. Chiarello	GSC	0.3	\$800.00	\$240.00	Telephone call with SZG.
08/16/2021	Shira Gelfand	SZG	0.4	\$425.00	\$170.00	Call with GSC; review EPA standard with respect to comparators; correspondence with client
08/17/2021	Gregory S. Chiarello	GSC	1.1	\$800.00	\$880.00	Review conference transcript (.1); Zoom call with client, SZG, MJ (.8); telephone call with SZG (.1); review correspondence to Court (.1).
08/17/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with client regarding next steps and legal strategy.
08/17/2021	Shira Gelfand	SZG	1.2	\$425.00	\$510.00	Call with GSC; call with client.
08/18/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to BXS regarding parastaffing coverage for summary judgment filing.
08/19/2021	Brian D. Kouassi	BDK	0.6	\$325.00	\$195.00	Correspondences with SZG, VXY, MSJ, and JLM re upcoming filing of Stipulation of Dismissal

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Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
08/19/2021	Gregory S. Chiarello	GSC	0.1	\$800.00	\$80.00	Edit stipulation of dismissal.
08/19/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review final stipulation of dismissal and draft correspondence to VXY regarding edit
08/19/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to SZG regarding scheduling and next steps regarding summary judgment prep.
08/19/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding scheduling and re-calendar meeting
08/19/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence and draft response to SZG/GCC regarding scheduling.
08/19/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review motion for voluntary dismissal and revise; circulate edit to VXY/BK
08/19/2021	Maya S. Jumper	MSJ	1.0	\$475.00	\$475.00	Conference with CDY regarding case strategy, prep for mediation, EEOC charge and amended charge and client communications.
08/19/2021	Shira Gelfand	SZG	4.2	\$425.00	\$1,785.00	Finalize drafting and editing stipulation of dismissal (.6); correspondence with opposing counsel (.1); continue drafting proof chart; conducting research re same(2.9); correspondence with paralegals re filing of stipulation (.6).
08/19/2021	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Finalize stipulation re voluntary dismissal.
08/20/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Save recent documents filed in the court.
08/20/2021	Jennifer LaMarch	JLM	0.2	\$350.00	\$70.00	File stip of discontinuance.
08/20/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review court order regarding voluntary dismissal and draft correspondence to SZG regarding same
08/20/2021	Shira Gelfand	SZG	0.8	\$425.00	\$340.00	Finalize letter filing (.6); review court order and correspondence with MSJ re same and proof chart (.2)
08/23/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Save recent order from the court to case database.
08/23/2021	Gregory S. Chiarello	GSC	0.2	\$800.00	\$160.00	Team status call.
08/23/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference with SZG regarding summary judgment and case updates.
08/23/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review court order regarding stipulation of voluntary dismissal.
08/23/2021	Shira Gelfand	SZG	2.3	\$425.00	\$977.50	Team meeting (.2); correspondence with client; attention to proof chart, send to GSC (1.7); review court filing (.4)
08/26/2021	Gregory S. Chiarello	GSC	0.6	\$800.00	\$480.00	Review SZG EPA proof charts (.2); correspondence with SZG re same (.2); conference with SZG re same (.2)
08/26/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from GCC regarding proof chart feedback.
08/26/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from GCC regarding proof chart feedback.
08/26/2021	Shira Gelfand	SZG	0.5	\$425.00	\$212.50	Call with GSC and correspondence re proof chart and next steps.
08/27/2021	Maya S. Jumper	MSJ	2.3	\$475.00	\$1,092.50	Review file and draft discrimination proof chart.
08/30/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to client regarding scheduling and review response
09/07/2021	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Telephone call with GSC re proof chart and summary judgment.
09/07/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to client regarding meeting scheduling.
09/08/2021	Cara E. Greene	CEG	0.7	\$950.00	\$665.00	Draft MSJ strategy and schedule memo.
09/08/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from client and draft response regarding case updates.
09/13/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG regarding scheduling and client call
09/13/2021	Shira Gelfand	SZG	0.3	\$425.00	\$127.50	Correspondence with team re scheduling and client call (.1); correspondence with client (.2)
09/14/2021	Shira Gelfand	SZG	2.3	\$425.00	\$977.50	Continue drafting proof chart, review of deposition transcripts and documents for inclusion
09/15/2021	Shira Gelfand	SZG	0.8	\$425.00	\$340.00	Continue drafting proof chart.
09/16/2021	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Review file and revise discrimination proof chart.
09/20/2021	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Correspondence with CEG and client.
09/22/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG regarding scheduling.
09/22/2021	Shira Gelfand	SZG	1.8	\$425.00	\$765.00	Correspondence with team; continue drafting proof chart.
09/23/2021	Shira Gelfand	SZG	0.7	\$425.00	\$297.50	Continue drafting proof chart.
09/27/2021	Cara E. Greene	CEG	1.1	\$950.00	\$1,045.00	Review case documents in advance of summary judgment.
09/27/2021	Maya S. Jumper	MSJ	2.2	\$475.00	\$1,045.00	Draft discrimination proof chart.
09/27/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding client deposition digest and draft response
09/27/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from SZG regarding meeting scheduling and draft response.
09/27/2021	Shira Gelfand	SZG	5.3	\$425.00	\$2,252.50	Correspondence with team (.3); correspondence with client (.2); begin drafting Ulku Rowe deposition digest for 2.23 deposition (4.8).
09/28/2021	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Correspondences with SZG re deposition transcripts.
09/28/2021	Shira Gelfand	SZG	6.4	\$425.00	\$2,720.00	Meeting with CEG (.2); Continue drafting Rowe deposition digest and edit and supplement Adam Lief deposition digest (5.8); correspondence with BXX (.4).
09/29/2021	Shira Gelfand	SZG	4.3	\$425.00	\$1,827.50	Edit and supplement Adam Lief + Ben Wilson deposition digest (3.2), prep for SJ filing. (1.1)
09/30/2021	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Case management meeting re summary judgment and proof chart.
09/30/2021	Maya S. Jumper	MSJ	2.7	\$475.00	\$1,282.50	Draft TVII/NYCHRL discrimination proof chart.
09/30/2021	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Conference call with CEG/SZG regarding case updates on summary judgment briefing and proof charts
09/30/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to BXS/SZG regarding staffing for sj filing
09/30/2021	Shira Gelfand	SZG	1.1	\$425.00	\$467.50	Team meeting with CEG and MSJ re summary judgment briefing (.6); call with MSJ (.1); correspondence re paralegal staffing (.3); review 56.1 statement samples (.1).
10/01/2021	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with MSJ re 56.1 statement strategy.
10/01/2021	Tara K. Quaglione	TKQ	7.0	\$450.00	\$3,150.00	Review Tariq Shaukat deposition and draft memorandum regarding same.
10/04/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Conference call with SZG/BXS regarding para assignment for summary judgment filing.
10/04/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Conference call with SZG regarding case updates and next steps.
10/04/2021	Shira Gelfand	SZG	4.7	\$425.00	\$1,997.50	Call with MSJ and BXS re staffing (.4); call with MSJ re SJ drafting strategy (.2); begin drafting 56.1 statement (4.0); correspondence with client (.1).
10/04/2021	Tara K. Quaglione	TKQ	8.0	\$450.00	\$3,600.00	Review Tariq Shaukat and Will Grannis depositions and draft memorandum regarding same
10/05/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding strategy and draft response regarding next steps.
10/05/2021	Shira Gelfand	SZG	5.7	\$425.00	\$2,422.50	Meeting with CEG (.1); Continue drafting 56.1 and review documents (4.7); draft outline for Nick Harteau call (.8); correspondence with TQ re deposition digests (.1).
10/05/2021	Tara K. Quaglione	TKQ	8.0	\$450.00	\$3,600.00	Review Will Grannis and Ulku Rowe depositions and draft memorandum regarding same
10/06/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review file and draft summary judgment prep workflow.
10/06/2021	Shira Gelfand	SZG	4.3	\$425.00	\$1,827.50	Continue drafting witness outline for Harteau, send to CEG(.6); Continue drafting affirmative 56.1 statement (3.8)
10/06/2021	Tara K. Quaglione	TKQ	8.0	\$450.00	\$3,600.00	Review Ulku Rowe and Stuart Vardaman depositions and draft memorandum regarding same.
10/07/2021	Shira Gelfand	SZG	3.1	\$425.00	\$1,317.50	Continue drafting 56.1 (3.0); correspondence with MSJ (.1).
10/07/2021	Tara K. Quaglione	TKQ	3.0	\$450.00	\$1,350.00	Review Stuart Vardaman deposition and draft memorandum regarding same.
10/08/2021	Shira Gelfand	SZG	4.8	\$425.00	\$2,040.00	Prep for call with client (.1); call with client (.2); correspondence with CEG and MSJ re witnesses; continue drafting 56.1 statement (4.3); correspondence with MSJ (.2).
10/08/2021	Tara K. Quaglione	TKQ	8.0	\$450.00	\$3,600.00	Review Stuart Vardaman and Evren Eryurek depositions and draft memorandum regarding same
10/12/2021	Shira Gelfand	SZG	4.3	\$425.00	\$1,827.50	Continue drafting 56.1 statement of facts, review of documents and deposition transcripts to assist in drafting
10/12/2021	Tara K. Quaglione	TKQ	7.0	\$450.00	\$3,150.00	Review Evren Eryurek and Kevin Lucas depositions and draft memorandum regarding same.
10/13/2021	Shira Gelfand	SZG	0.7	\$425.00	\$297.50	Continue drafting 56.1, research and review of documents for inclusion
10/13/2021	Tara K. Quaglione	TKQ	8.0	\$450.00	\$3,600.00	Review Kevin Lucas deposition and draft memorandum regarding same.
10/14/2021	Maya S. Jumper	MSJ	2.3	\$475.00	\$1,092.50	Finalize discrimination proof chart.
10/14/2021	Tara K. Quaglione	TKQ	8.0	\$450.00	\$3,600.00	Review Kevin Lucas and Stuart Breslow depositions and draft memorandum regarding same.
10/15/2021	Tara K. Quaglione	TKQ	8.0	\$450.00	\$3,600.00	Review Stuart Breslow deposition and draft memorandum regarding same.
10/18/2021	Shira Gelfand	SZG	5.3	\$425.00	\$2,252.50	Correspondence with team (.1) ; continue drafting 56.1 (5.0); correspondence with BXX re exhibit task (.2)
10/18/2021	Tara K. Quaglione	TKQ	8.0	\$450.00	\$3,600.00	Review Stuart Breslow and Bernita Jamison depositions and draft memorandum regarding same
10/19/2021	Brian D. Kouassi	BDK	1.3	\$325.00	\$422.50	Compile documents re Summary Judgement for 56.1 review.
10/19/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with MSJ re compiling documents and creating portfolio for review
10/19/2021	Maya S. Jumper	MSJ	2.0	\$475.00	\$950.00	Review and revise 56.1 statement.

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
10/19/2021	Shira Gelfand	SZG	4.5	\$425.00	\$1,912.50	Continue drafting 56.1 (4.1); correspondence with MSJ (.1); compile relevant exhibits and send to MSJ for review (.3).
10/19/2021	Tara K. Quaglion	TKQ	7.0	\$450.00	\$3,150.00	Review Bernita Jamison deposition and draft memorandum regarding same.
10/20/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Update docket folder re Defendant's Letter Requesting Relief from Submission Limitations.
10/20/2021	Brian D. Kouassi	BDK	5.4	\$325.00	\$1,755.00	Download and compile documents re upcoming Summary Judgement.
10/20/2021	Maya S. Jumper	MSJ	2.6	\$475.00	\$1,235.00	Review and revise 56.1.
10/20/2021	Shira Gelfand	SZG	2.7	\$425.00	\$1,147.50	Correspondence with MSJ and CEG (.2); correspondence with BK re 56.1 exhibit tasks (.2); review MSJ edits to 56.1 and continue drafting (1.8); review Google's letter re exhibit numbers (.5).
10/20/2021	Tara K. Quaglion	TKQ	7.5	\$450.00	\$3,375.00	Review Brian Stevens deposition and draft memorandum regarding same.
10/21/2021	Brian D. Kouassi	BDK	0.9	\$325.00	\$292.50	Create portfolio of documents cited in the brief.
10/21/2021	Brian D. Kouassi	BDK	5.2	\$325.00	\$1,690.00	Compile and download documents re Summary Judgment.
10/21/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondences with JLM and MSJ re upcoming filing.
10/21/2021	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Correspondences with VXY re compiling documents.
10/21/2021	Jennifer LaMarch	JLM	0.5	\$350.00	\$175.00	File response to Google's request for enlargement of page and exhibit limits.
10/21/2021	Maya S. Jumper	MSJ	1.8	\$475.00	\$855.00	Draft affirmative SJ brief.
10/21/2021	Maya S. Jumper	MSJ	1.9	\$475.00	\$902.50	Review correspondence and draft letter response to Google's request for enlargement.
10/21/2021	Shira Gelfand	SZG	1.8	\$425.00	\$765.00	Continue edits to 56.1 (.8); call with team (.2); review letter and correspondence re same (.4); correspondence with BXK re exhibits (.4).
10/21/2021	Tara K. Quaglion	TKQ	1.7	\$450.00	\$765.00	Review Brian Stevens deposition and draft memorandum regarding same.
10/21/2021	Vincent Yang	VXY	0.6	\$325.00	\$195.00	Pull summary judgment exhibit documents from Nuix for SXG review.
10/22/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with TAM re joining team for upcoming Summary Judgment.
10/22/2021	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Correspondence re paralegal tasks for SJ.
10/22/2021	Tracee A. Manettas	TAM	0.1	\$350.00	\$35.00	Correspondence with BDK re onboarding to case.
10/22/2021	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Save conformed letters to case file.
10/27/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review correspondence from opposing counsel regarding scheduling, review judge's rules and draft response to CEG regarding proposal for revised schedule.
10/27/2021	Maya S. Jumper	MSJ	2.2	\$475.00	\$1,045.00	Review file and draft discrimination proof chart.
10/27/2021	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Correspondence with counsel and team.
10/29/2021	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with client.
11/01/2021	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence with client.
11/01/2021	Maya S. Jumper	MSJ	1.4	\$475.00	\$665.00	Review Defendant's motion for summary judgment and exhibits.
11/01/2021	Maya S. Jumper	MSJ	2.1	\$475.00	\$997.50	Review Defendant's motion for summary judgment.
11/01/2021	Maya S. Jumper	MSJ	1.9	\$475.00	\$902.50	Review file and draft affirmative brief ISO motion for summary judgment.
11/01/2021	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Correspondence with client and team.
11/02/2021	Brian D. Kouassi	BDK	0.8	\$325.00	\$260.00	Update docket folder.
11/02/2021	Brian D. Kouassi	BDK	1.7	\$325.00	\$552.50	Download production from Def's and other documents from last night filing to the Court
11/02/2021	Brian D. Kouassi	BDK	1.4	\$325.00	\$455.00	Create PDF portfolio of last night filing from Defendant's to the Court re Summary Judgment
11/02/2021	Cara E. Greene	CEG	2.2	\$950.00	\$2,090.00	Review summary judgment filings and exhibits.
11/02/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review order and draft correspondence to client regarding motion for summary judgment
11/02/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from BK and draft response regarding document preparation
11/02/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from opposing counsel and draft response to ATK/CDY/NR regarding strategy
11/02/2021	Maya S. Jumper	MSJ	2.5	\$475.00	\$1,187.50	Review file; draft affirmative motion ISO summary judgment.
11/02/2021	Shira Gelfand	SZG	3.3	\$425.00	\$1,402.50	Review Google's summary judgment submission (2.7); correspondence with team and client (.6).
11/03/2021	Brian D. Kouassi	BDK	0.8	\$325.00	\$260.00	Download production from Defendant's counsel.
11/03/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Phone conference with SZG re missing documents from Defendant's production.
11/03/2021	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Review documents from Defendant's production re missing documents due to sealed filing
11/03/2021	Brian D. Kouassi	BDK	0.9	\$325.00	\$292.50	Compress documents from Defendant's production for client's review.
11/03/2021	Brian D. Kouassi	BDK	0.7	\$325.00	\$227.50	Upload production and send to client for review.
11/03/2021	Cara E. Greene	CEG	1.8	\$950.00	\$1,710.00	Finish reviewing materials and telephone call with client re same (1.6); correspondence re motion to seal (.2)
11/03/2021	Cara E. Greene	CEG	1.6	\$950.00	\$1,520.00	Prepare for and present at attorneys meeting.
11/03/2021	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Review Defendant's motion to seal and exhibits and draft correspondence regarding strategy for opposition
11/03/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from SZG regarding sj timeline and provide edits.
11/03/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to BXK/VXY regarding calendaring deadlines for motion to seal
11/03/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review judge's rules and protective order regarding sealing motion and draft correspondence to CEG
11/03/2021	Shira Gelfand	SZG	3.7	\$425.00	\$1,572.50	Call with client (.2); team meeting (.5); call with MSJ (.1); create task list for team (.2); begin drafting 56.1 opposition (2.7)
11/03/2021	Tracee A. Manettas	TAM	0.1	\$350.00	\$35.00	Correspondence with SZG re meeting re MSJ filing.
11/03/2021	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Calendar opposition to summary judgment and Defendant's reply deadline.
11/03/2021	Vincent Yang	VXY	1.1	\$325.00	\$357.50	Format numbering structure re Defendant's 56.1 statement for SZG.
11/04/2021	Shira Gelfand	SZG	2.8	\$425.00	\$1,190.00	Meeting with CEG (.1); attention to 56.1 drafting (1.8); correspondence with client; draft script for client call with witnesses (.7); correspondence with paralegals (.2).
11/05/2021	Shira Gelfand	SZG	4.2	\$425.00	\$1,785.00	Continue drafting 56.1 opposition (3.6); correspondence with client (.1); call with CEG (.1); draft script for witness calls (.2); call with MSJ; Prep for witness call; calls with two witnesses (no answer) (.1); correspondence with paralegals re exhibit index, re new paralegal case orientation (.1).
11/05/2021	Tracee A. Manettas	TAM	0.1	\$350.00	\$35.00	Correspondence with BXS re onboarding to matter.
11/05/2021	Tracee A. Manettas	TAM	0.1	\$350.00	\$35.00	Correspondence with SZG and MSJ re meeting to on-board to matter.
11/05/2021	Vincent Yang	VXY	2.2	\$325.00	\$715.00	Compile spreadsheet re Defendant's Motion for Summary Judgment exhibits.
11/06/2021	Shira Gelfand	SZG	4.8	\$425.00	\$2,040.00	Draft objectives for witness calls (.3); continue drafting 56.1 opposition (4.3); correspondence with paralegals re Rowe deposition exhibits (.2).
11/07/2021	Maya S. Jumper	MSJ	3.7	\$475.00	\$1,757.50	Draft affirmative summary judgment brief.
11/08/2021	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Create PDF portfolio of Defendant's motion to seal.
11/08/2021	Gregory S. Chiarello	GSC	1.0	\$800.00	\$800.00	Telephone call with SZG re Opp to Motion to Seal (.2); review sealing motion (.5); correspondence with SZG, MJ (.1); conference with SZG re witness calls (.2).
11/08/2021	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Corresponding with MSJ re: working on opposing sealing motion.
11/08/2021	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Contacting AIM re: sample oppositions to sealing.
11/08/2021	Jennifer Davidson	JDX	0.8	\$425.00	\$340.00	Reviewing briefing on motion to seal.
11/08/2021	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Corresponding with SZG re: setting up meeting to discuss case and next steps.
11/08/2021	Jennifer Davidson	JDX	1.1	\$425.00	\$467.50	Researching opposition to motion to seal.
11/08/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review motion to seal and file in preparation for call with SZG
11/08/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from OM regarding staffing and draft response.
11/08/2021	Shira Gelfand	SZG	6.3	\$425.00	\$2,677.50	Call with MSJ (.1); call with GSC re opposition to motion to seal (.2); review of motion to seal / exhibits and correspondence with team re same (1.3); continue drafting 56.1 opposition (4.3); Prep for witness call (.2); call MSJ and witness (.1); correspondence with client and with paralegals (.1).
11/09/2021	Gregory S. Chiarello	GSC	0.7	\$800.00	\$560.00	Correspondence with SZG re witness calls (.1); telephone conference with team re sealing motion opp (.5); preparation for same (.1).
11/09/2021	Jennifer Davidson	JDX	3.7	\$425.00	\$1,572.50	Researching opposition to motion to seal.

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Case No. 19-cv-08655 (JHR)
Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
11/09/2021	Jennifer Davidson	JDX	0.5	\$425.00	\$212.50	Call with MSJ, SZG, and GSC re: motion to seal.
11/09/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with GCC/SZG/JXD regarding opposition to motion to seal.
11/09/2021	Shira Gelfand	SZG	4.7	\$425.00	\$1,997.50	Prep for and conduct Witness call with Nic Harteau (.6); review motion to seal and attend team meeting re same (.5); review client notes of 56.1 (.5) ; continue drafting 56.1 opposition (3.1).
11/10/2021	Jennifer Davidson	JDX	1.4	\$425.00	\$595.00	Researching opposition to motion to seal.
11/10/2021	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Corresponding w attorneys list serve to request sample sealing motion.
11/10/2021	Jennifer Davidson	JDX	1.8	\$425.00	\$765.00	Researching and drafting opposition to motion to seal.
11/10/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review file and circulate sample opposition to sealing to JXD.
11/10/2021	Shira Gelfand	SZG	4.1	\$425.00	\$1,742.50	Correspondence re opposition to motion to seal (.2); continue drafting 56.1 and review client correspondence re same (3.5); correspondence with TXM re Rowe depo exhibits (.4).
11/10/2021	Tracee A. Manettas	TAM	0.4	\$350.00	\$140.00	Correspondence with SZG and VXY re exhibits to depositions.
11/10/2021	Tracee A. Manettas	TAM	0.1	\$350.00	\$35.00	Correspondence with Nuix team re access to case file.
11/10/2021	Tracee A. Manettas	TAM	0.5	\$350.00	\$175.00	Search case file for marked exhibits for deposition transcript
11/10/2021	Vincent Yang	VXY	0.8	\$325.00	\$260.00	Pull exhibits marked in Plaintiff U. Rowe's deposition and save to case file.
11/11/2021	Gregory S. Chiarello	GSC	0.2	\$800.00	\$160.00	Conference with SZG.
11/11/2021	Jennifer Davidson	JDX	5.7	\$425.00	\$2,422.50	Drafting opposition to motion to seal.
11/11/2021	Shira Gelfand	SZG	4.6	\$425.00	\$1,955.00	Correspondence with client (.1); edit and supplement 56.1 statement (3.7); review opp to motion to seal (.6); correspondence with GSC (.2).
11/12/2021	Gregory S. Chiarello	GSC	4.1	\$800.00	\$3,280.00	Edit sealing motion opp brief (3.4); conference with SZG (.3); correspondence with team (.4)
11/12/2021	Jennifer Davidson	JDX	0.3	\$425.00	\$127.50	Drafting proposed order and notice of motion.
11/12/2021	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Drafting opposition to motion to seal.
11/12/2021	Jennifer Davidson	JDX	0.5	\$425.00	\$212.50	Corresponding with MSJ and SZG re: next steps on opposition to seal.
11/12/2021	Jennifer Davidson	JDX	0.2	\$425.00	\$85.00	Reviewing edits to motion to seal.
11/12/2021	Jennifer Davidson	JDX	0.3	\$425.00	\$127.50	Corresponding with GSC re: next steps on opposition to motion to seal.
11/12/2021	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Scheduling call to discuss opposition to sealing motion.
11/12/2021	Shira Gelfand	SZG	6.8	\$425.00	\$2,890.00	Continue drafting 56.1 (5.8); attention to opposition to motion to seal and correspondence, review brief (.4) ; prep for and call with client (.3); call with GSC re strategy (.3).
11/12/2021	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Run Nuix search for Plaintiff's prior job experiences.
11/13/2021	Jennifer Davidson	JDX	0.6	\$425.00	\$255.00	Editing opposition to motion to seal.
11/14/2021	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Correspondence with client.
11/15/2021	Cara E. Greene	CEG	2.6	\$950.00	\$2,470.00	First review of SJ cross-motion brief (.4); telephone call with SZG re motions (.2); case management meeting with GSC, SZG and prepare for same (1.0); review and edit motion to seal opposition brief (1.0).
11/15/2021	Gregory S. Chiarello	GSC	2.2	\$800.00	\$1,760.00	Edit motion to seal opposition brief (1.3); team calls re matter (.7); final review of brief (.2)
11/15/2021	Jennifer Davidson	JDX	0.2	\$425.00	\$85.00	Email associates to set up cite check for opposition to sealing motion.
11/15/2021	Jennifer Davidson	JDX	0.3	\$425.00	\$127.50	Reviewing edits to opposition to motion to seal.
11/15/2021	Jennifer Davidson	JDX	3.9	\$425.00	\$1,657.50	Editing opposition to motion to seal.
11/15/2021	Jennifer Davidson	JDX	0.3	\$425.00	\$127.50	Conference with SZG and GSC re: opposition to sealing motion.
11/15/2021	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Correspond with GSC re: opposition to motion to seal.
11/15/2021	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Correspond with SZG re: opposition to motion to seal.
11/15/2021	Jennifer Davidson	JDX	0.3	\$425.00	\$127.50	Preparing and circulating document for cite check.
11/15/2021	Maya S. Jumper	MSJ	6.4	\$475.00	\$3,040.00	Draft opposition brief.
11/15/2021	Shira Gelfand	SZG	5.2	\$425.00	\$2,210.00	Correspondence with client (.2); prep agenda for team meeting(.3); meeting with GSC and JD re motion to seal opp (.7); call with CEG re motions (.2); case management meeting with CEG and GSC (1); case orientation with TXM (.3); review motion to seal opp and correspondence re cite check; attention to editing and supplementing 56.1 with client input (2.7).
11/15/2021	Tracee A. Manettas	TAM	0.3	\$350.00	\$105.00	Telephone call with SZG re onboarding to matter.
11/15/2021	Tracee A. Manettas	TAM	0.2	\$350.00	\$70.00	Correspondence with team re scheduling all hands meeting for motion summary judgment overview
11/16/2021	Brian D. Kouassi	BDK	1.8	\$325.00	\$585.00	Finalize Memorandum of Law in Support of Plaintiff's Opposition to Defendant's Motion to Seal with TOA/TOC
11/16/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Phone conference with ALM re TOA/TOC.
11/16/2021	Cara E. Greene	CEG	6.2	\$950.00	\$5,890.00	Prepare for call with N. Harteau (.5); telephone call with N. Harteau (.7); conference with SZG re N. Harteau declaration (.2); review and edit affirmative 56.1 statement (4.1); conference with GSC re opposition brief and case management (.5); review N. Harteau declaration (.2).
11/16/2021	Gregory S. Chiarello	GSC	0.3	\$800.00	\$240.00	Edits to motion to seal opp.
11/16/2021	Gregory S. Chiarello	GSC	0.3	\$800.00	\$240.00	Conference with CEG re MSJ briefing.
11/16/2021	Jennifer Davidson	JDX	1.8	\$425.00	\$765.00	Editing opposition to motion to seal.
11/16/2021	Jennifer Davidson	JDX	0.2	\$425.00	\$85.00	Corresponding with BDK and SZG re: getting TOC/TOA in opposition to seal ready for filing
11/16/2021	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Corresponding with GSC re: finalizing opposition to motion to seal
11/16/2021	Jennifer Davidson	JDX	0.2	\$425.00	\$85.00	Corresponding with MSJ re: status of proposed order and opposition to motion to seal
11/16/2021	Jennifer Davidson	JDX	0.2	\$425.00	\$85.00	Finalizing opposition to motion to seal.
11/16/2021	Jennifer Davidson	JDX	0.2	\$425.00	\$85.00	Coordinating with JLM re: opposition to motion to seal for filing
11/16/2021	Jennifer LaMarch	JLM	0.3	\$350.00	\$105.00	File opposition to motion to seal.
11/16/2021	Maya S. Jumper	MSJ	5.7	\$475.00	\$2,707.50	Draft opposition brief.
11/16/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review proposed order and circulate revisions to JXD.
11/16/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review MOL IOT sealing and circulate edits to JXD/GCC.
11/16/2021	Shira Gelfand	SZG	6.3	\$425.00	\$2,677.50	Meeting with CEG re N. Harteau declaration (.2); continue drafting 56.1 (4.1); prep for and call with Nic Harteau (.5); draft declaration (.5) ; correspondence with client (.1); review AEO doc and protective order, correspondence with CEG re same (.6); attention to opposition to motion to seal filing (.3).
11/16/2021	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Format page numbering in opposition to Defendant's motion to seal.
11/17/2021	Cara E. Greene	CEG	1.0	\$950.00	\$950.00	Telephone call with SZG re SJ tasks, correspondence with MSJ re opposition brief (.5); review and edit N. Harteau declaration, review related documents (.5).
11/17/2021	Maya S. Jumper	MSJ	11.2	\$475.00	\$5,320.00	Draft summary judgment opposition.
11/17/2021	Shira Gelfand	SZG	7.6	\$425.00	\$3,230.00	Review filed motion to seal opposition; calls with CEG re outstanding tasks (.5); continue drafting 56.1 opposition, review client notes and incorporate into 56.1 (6.7); correspondence with CEG and client re potential witnesses (.4).
11/18/2021	Maya S. Jumper	MSJ	9.8	\$475.00	\$4,655.00	Draft opposition brief.
11/19/2021	Brian D. Kouassi	BDK	0.6	\$325.00	\$195.00	Summary Judgement Overview.
11/19/2021	Cara E. Greene	CEG	4.3	\$950.00	\$4,085.00	Case management meeting with prepare for SJ filings, and prepare for same (.9); conference with SZG and MSJ re schedule and briefs (.2); review AEO materials and protective order and conference with SZG re same (.5); edit N. Harteau declaration and review related materials, conference with SZG re same (1.3); conference with SZG re affirmative 56.1 statement edits (.4); continue reviewing and editing 56.1 opposition (1.0).
11/19/2021	Maya S. Jumper	MSJ	1.0	\$475.00	\$475.00	Conference call with CEG/SZG/TAM/BK/VY regarding summary judgment filing prep.
11/19/2021	Maya S. Jumper	MSJ	11.7	\$475.00	\$5,557.50	Review file and draft opposition brief.
11/19/2021	Shira Gelfand	SZG	7.9	\$425.00	\$3,357.50	Meeting with CEG (.5); prep for full team meeting (.3); meet with paralegals re summary judgment prep (1); meeting with CEG and MSJ re schedule and briefs (.2); Review edits to declaration and correspondence re same, Edit and supplement affirmative 56.1 and add citations (5.1); draft correspondence to counsel re confidentiality designations; meeting with CEG re same (1.7).
11/19/2021	Tracee A. Manettas	TAM	0.7	\$350.00	\$245.00	Meeting with CEG, SZG, MSJ, BDK and VXY re planning for motion summary judgment filing

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
11/19/2021	Tracee A. Manettas	TAM	0.2	\$350.00	\$70.00	Schedule follow up motion summary judgment filing planning meetings
11/19/2021	Tracee A. Manettas	TAM	0.2	\$350.00	\$70.00	Correspondence with BDK and VXY re task list for motion summary judgment filing
11/19/2021	Vincent Yang	VXY	0.6	\$325.00	\$195.00	Telephone conference with CEG, SZG, MSJ, TAM, BDK re summary judgment planning and scheduling
11/20/2021	Shira Gelfand	SZG	4.3	\$425.00	\$1,827.50	Finish editing and placing cites into 56.1 (4.1); correspondence with team re tasks for same (.2)
11/22/2021	Maya S. Jumper	MSJ	3.8	\$475.00	\$1,805.00	Draft Pl.'s Counterstatement in Support of Opposition to SJ.
11/22/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference call with CEG/SZG regarding summary judgment opposition and tasks.
11/22/2021	Maya S. Jumper	MSJ	7.2	\$475.00	\$3,420.00	Draft summary judgment opposition.
11/22/2021	Shira Gelfand	SZG	5.2	\$425.00	\$2,210.00	Meeting with CEG re 56.1 opposition and Harteau Declaration, call with Nic Harteau, follow up correspondence with Nic Harteau (2.8); Correspondence with client (.1); Begin edits to 56.1 opposition and review record for citations (2.1) ; correspondence with paralegals re tasks (.2).
11/22/2021	Tracee A. Manettas	TAM	0.2	\$350.00	\$70.00	Correspondence with SZG re exhibits and index for affirmative 56.1 statement.
11/22/2021	Tracee A. Manettas	TAM	0.3	\$350.00	\$105.00	Review orders and local Court rules re number of pages, exhibits, electronic filing and courtesy copies of motions
11/22/2021	Tracee A. Manettas	TAM	0.6	\$350.00	\$210.00	Meeting with BDK and VXY re task list distribution for motion summary judgment filing
11/22/2021	Tracee A. Manettas	TAM	0.3	\$350.00	\$105.00	Correspondence with team re organizational structure for 56.1 statements and motion summary judgment brief
11/22/2021	Vincent Yang	VXY	1.8	\$325.00	\$585.00	Draft motion for summary judgment filing map; research local rules re same
11/22/2021	Vincent Yang	VXY	0.6	\$325.00	\$195.00	Telephone conference with BDK and TAM re tasks for summary judgment.
11/23/2021	Gregory S. Chiarello	GSC	0.7	\$800.00	\$560.00	Team meeting with paralegals.
11/23/2021	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Reviewing Defendant's reply in support of motion to seal.
11/23/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with CEG/SZG and client regarding case updates and summary judgment filings.
11/23/2021	Maya S. Jumper	MSJ	0.8	\$475.00	\$380.00	Conference call with CEG/GCC/SZG/TAM/BK/VXY regarding summary judgment filing strategy.
11/23/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from TAM regarding lit support task assignments.
11/23/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review file and circulate draft declaration templates to BK.
11/23/2021	Maya S. Jumper	MSJ	2.8	\$475.00	\$1,330.00	Draft counterstatement to 56.1; revise opposition brief.
11/23/2021	Shira Gelfand	SZG	9.7	\$425.00	\$4,122.50	Continue drafting and editing 56.1 (6.9); meeting with client (.2); team meetings re summary judgment (1.3); correspondence with CEG (.3); call with TTM (.2); review Google's reply re motion to seal and correspondence with counsel re sealing (.8).
11/23/2021	Tracee A. Manettas	TAM	0.1	\$350.00	\$35.00	Correspondence with SZG re task list for motion summary judgment filing.
11/23/2021	Tracee A. Manettas	TAM	1.0	\$350.00	\$350.00	Create and circulate task lists re motion summary judgment filing planning and correspondence with team re same
11/23/2021	Tracee A. Manettas	TAM	0.7	\$350.00	\$245.00	Meeting with CEG, GSC, SZG, MSJ, BDK and VXY re planning for motion summary judgment filing
11/23/2021	Tracee A. Manettas	TAM	0.4	\$350.00	\$140.00	Correspondence with SZG, BDK, VXY and ALM re templates for sealing motion and motion summary judgment
11/23/2021	Tracee A. Manettas	TAM	1.0	\$350.00	\$350.00	Draft proposed order, notice of motion, certificate of service, correspondence to Court re motion summary judgment, declaration, statement of facts and exhibits and correspondence with team re same.
11/23/2021	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Compile documents referenced in 56.1 statement in case file.
11/23/2021	Vincent Yang	VXY	0.7	\$325.00	\$227.50	Telephone conference with CEG, MSJ, SZG, GC, BDK, and TAM re motion for summary judgment task division and updates.
11/24/2021	Cara E. Greene	CEG	3.2	\$950.00	\$3,040.00	Work on combining briefs.
11/24/2021	Maya S. Jumper	MSJ	2.4	\$475.00	\$1,140.00	Draft rebuttal statement to Defendant's 56.1 and revise brief.
11/24/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with CEG/SZG regarding case updates and next steps.
11/24/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from SZG regarding additions to rebuttal statement and draft response.
11/24/2021	Maya S. Jumper	MSJ	1.8	\$475.00	\$855.00	Revise rebuttal statement.
11/24/2021	Shira Gelfand	SZG	9.3	\$425.00	\$3,952.50	Draft 56.1 opposition statement (8); team meeting with MSJ and CEG re case updates (.5); call with CEG (.3); call with paralegals re summary judgment (.3); correspondence with client (.2).
11/24/2021	Tracee A. Manettas	TAM	0.3	\$350.00	\$105.00	Meeting with SZG, BDK and VXY re status of task list for motion summary judgment filing.
11/24/2021	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Telephone conference with SZG, BDK, and TAM re summary judgment updates and tasks.
11/26/2021	Brian D. Kouassi	BDK	5.8	\$325.00	\$1,885.00	Pull and list descriptions of Defendant's Summary Judgment exhibits.
11/26/2021	Shira Gelfand	SZG	6.3	\$425.00	\$2,677.50	Continue editing and drafting 56.1 opposition (6.1); correspondence with BDK re exhibits (.2)
11/26/2021	Vincent Yang	VXY	4.3	\$325.00	\$1,397.50	Compile affirmative 56.1 exhibits; pull re same from Nuix; index re same
11/27/2021	Brian D. Kouassi	BDK	8.6	\$325.00	\$2,795.00	Pull and list descriptions of Defendant's Motion to Seal exhibits.
11/27/2021	Shira Gelfand	SZG	10.2	\$425.00	\$4,335.00	Continue editing/drafting 56.1 opp (7.6); correspondence with BDK and CEG (.3); compile exhibits and review for confidentiality (.2.3).
11/28/2021	Maya S. Jumper	MSJ	1.2	\$475.00	\$570.00	Draft rebuttal statement to 56.1.
11/28/2021	Shira Gelfand	SZG	11.3	\$425.00	\$4,802.50	Editing and drafting of opposition 56.1 (9.1) ; correspondence with client (.1); correspondence with BDK (.2); analyze and compile confidential exhibits for disclosure to Defendant (1.9).
11/29/2021	Brian D. Kouassi	BDK	7.2	\$325.00	\$2,340.00	Pull citations and documents from Defendant's Summary Judgment and Motion to Seal re Plaintiff's confidential citations and documents for Plaintiff's upcoming Summary Judgment and Motion to Seal.
11/29/2021	Brian D. Kouassi	BDK	0.6	\$325.00	\$195.00	Video conference with MSJ, CEG, GSC, SZG, TAM, and VXY re next steps and preparation for Summary Judgment
11/29/2021	Brian D. Kouassi	BDK	1.9	\$325.00	\$617.50	Finalization of Plaintiff's consolidated list of confidential exhibits to send to Defendant's counsel
11/29/2021	Cara E. Greene	CEG	4.5	\$950.00	\$4,275.00	Finish combining briefs into one brief.
11/29/2021	Gregory S. Chiarello	GSC	1.0	\$800.00	\$800.00	Team meeting (.6); correspondence with JDX (.2); telephone call with CEG (.2)
11/29/2021	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Corresponding with OM re: affirmative motion to seal.
11/29/2021	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Corresponding with GCS re: affirmative motion to seal.
11/29/2021	Maya S. Jumper	MSJ	6.1	\$475.00	\$2,897.50	Draft rebuttal statement to Defendant's 56.1.
11/29/2021	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Draft correspondence to BK regarding citation check and confidentiality designations; review designations
11/29/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Draft correspondence to opposing counsel regarding confidentiality designations
11/29/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Conference call with CEG/SZG regarding case updates and next steps on summary judgment filing.
11/29/2021	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Conference call with CEG/GCC/SZG/TAM/BK/VXY/JLM regarding summary judgment filing tasks and timeline.
11/29/2021	Shira Gelfand	SZG	9.6	\$425.00	\$4,080.00	Correspondence with paralegals (.1); meeting with CEG and MSJ re next steps on summary judgment (.4); team meeting re summary judgment timeline (.6); edit summary judgment brief and research re same (6.4); attention to confidential exhibit list (1.7); correspondence with witness (.4).
11/29/2021	Tracee A. Manettas	TAM	0.6	\$350.00	\$210.00	Research Court rules regarding CD production and correspondence with DJ and HJ re same
11/29/2021	Tracee A. Manettas	TAM	0.6	\$350.00	\$210.00	Meeting with CEG, GSC, SZG, MSJ, VXY, BDK and JLM re preparation for motion summary judgment filing
11/29/2021	Tracee A. Manettas	TAM	0.1	\$350.00	\$35.00	Correspondence with SZG re comparators' compensation chart for motion summary judgment filing
11/29/2021	Tracee A. Manettas	TAM	0.9	\$350.00	\$315.00	Draft comparators' compensation chart for exhibit to declaration of CEG for motion summary judgment and correspondence with SZG re same.
11/29/2021	Vincent Yang	VXY	5.4	\$325.00	\$1,755.00	Prepare, pull and quality check affirmative and opposition 56.1 exhibits
11/29/2021	Vincent Yang	VXY	2.0	\$325.00	\$650.00	Compile list of exhibits from 56.1 and rebuttal requiring Defendant's confidentiality designation; correspondence with SZG, MSJ, and BDK re same.
11/29/2021	Vincent Yang	VXY	0.6	\$325.00	\$195.00	Telephone conference with CEG, MSJ, SZG, GSC, BDK, and TAM re summary judgment updates and tasks.
11/30/2021	Cara E. Greene	CEG	7.9	\$950.00	\$7,505.00	Continue to draft opposition/support brief.
11/30/2021	Gregory S. Chiarello	GSC	0.5	\$800.00	\$400.00	Team call.
11/30/2021	Jennifer Davidson	JDX	0.3	\$425.00	\$127.50	Researching Judge Schofield's briefing rules for sealing motions.
11/30/2021	Maya S. Jumper	MSJ	4.5	\$475.00	\$2,137.50	Review file and revise 56.1 rebuttal to incorporate additional citations
11/30/2021	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Conference call with CEG/GCC/TAM/BK/VXY regarding case updates and next steps regarding summary judgment filing.
11/30/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Conference call with SZG regarding sj citations.

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Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
11/30/2021	Shira Gelfand	SZG	5.3	\$425.00	\$2,252.50	Edits to affirmative and opposition 56.1 (4.3); meeting with CEG (.3); call with MSJ re summary judgment citations (.2); attention to confidential exhibits (.4).
11/30/2021	Tracee A. Manettas	TAM	0.5	\$350.00	\$175.00	Edit comparators' compensation chart declaration of CEG for motion summary judgment and correspondence with SZG re same.
11/30/2021	Tracee A. Manettas	TAM	0.2	\$350.00	\$70.00	Update task list for motion summary judgment filing and circulate to team.
11/30/2021	Tracee A. Manettas	TAM	0.6	\$350.00	\$210.00	Meeting with CEG, GSC, SZG, MSJ, VXY, BDK re preparation for motion summary judgment filing
11/30/2021	Tracee A. Manettas	TAM	0.1	\$350.00	\$35.00	Call with clerk re hand delivery instructions.
11/30/2021	Tracee A. Manettas	TAM	0.2	\$350.00	\$70.00	Research hand delivery procedure for CD drop-off to Court and correspondence with CEG re same
11/30/2021	Tracee A. Manettas	TAM	0.3	\$350.00	\$105.00	Further update current task list for motion summary judgment filing and correspondence with team re same
11/30/2021	Vincent Yang	VXY	0.6	\$325.00	\$195.00	Telephone conference with CEG, GSC, MSJ, BDK, and TAM re summary judgment updates and division of tasks
11/30/2021	Vincent Yang	VXY	1.8	\$325.00	\$585.00	Compile master list of exhibits on spreadsheet; correspondence with MSJ re same.
11/30/2021	Vincent Yang	VXY	1.5	\$325.00	\$487.50	Draft template for CEG sealing declaration.
12/01/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Video conference with MSJ, CEG, GXC, SZG, TAM, and VXY re next steps and preparation for Summary Judgment
12/01/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with SZG re updated edits to the 56.1 rebuttal.
12/01/2021	Brian D. Kouassi	BDK	6.4	\$325.00	\$2,080.00	Compile documents of transcripts cites and document production citation in Plaintiff's Rebuttal
12/01/2021	Gregory S. Chiarello	GSC	0.6	\$800.00	\$480.00	Team meeting (.3); correspondence with JDX (.2); correspondence with CEG (.1).
12/01/2021	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Corresponding with GSC re: motion to unseal.
12/01/2021	Jennifer Davidson	JDX	0.8	\$425.00	\$340.00	Drafting motion to unseal MSJ exhibits.
12/01/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with GCC/SZG/BK/VXY regarding case updates and next steps regarding summary judgment.
12/01/2021	Maya S. Jumper	MSJ	1.4	\$475.00	\$665.00	Review file and update 56.1 rebuttal.
12/01/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from opposing counsel and draft correspondence to BK/VY regarding document pull
12/01/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review file and draft correspondence to opposing counsel regarding confidentiality designations
12/01/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review file and draft correspondence to GCC regarding categories of confidential docs for motion to seal
12/01/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to client regarding case updates.
12/01/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from client and draft response regarding scheduling
12/01/2021	Shira Gelfand	SZG	10.8	\$425.00	\$4,590.00	Team meeting re next steps on summary judgment (.4); Correspondence with team (.5); correspondence with client (.2); call and follow up correspondence with third party witness (.2); edit declaration (.8); edit and supplement rebuttal 56.1 (6.4); Incorporate client edits into Affirmative 56.1 (1.3); correspondence re confidentiality of exhibits (.4); call with GSC (.3); correspondence re sealing motion (.3).
12/01/2021	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Search Nuix for document cited in 56.1.
12/01/2021	Vincent Yang	VXY	0.4	\$325.00	\$130.00	Telephone conference with GSC, MSJ, SZG, and BDK re summary judgment updates and confidentiality
12/02/2021	Brian D. Kouassi	BDK	0.6	\$325.00	\$195.00	Video conference with MSJ, CEG, GXC, SZG, TAM, and VXY re next steps and preparation for Summary Judgment
12/02/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondences with SZG re 2017-2019 L8 and L9 Employee Snapshots Spreadsheet
12/02/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Locate 2017-2019 L8 and L9 Employee Snapshots Spreadsheet for attorney review
12/02/2021	Cara E. Greene	CEG	9.5	\$950.00	\$9,025.00	Continue drafting combined brief, and related 56.1 sections
12/02/2021	Gregory S. Chiarello	GSC	0.5	\$800.00	\$400.00	Correspondence with J. Davidson (.1); team Zoom call.
12/02/2021	Jennifer Davidson	JDX	4.6	\$425.00	\$1,955.00	Researching/drafting motion to unseal MSJ exhibits.
12/02/2021	Jennifer Davidson	JDX	0.5	\$425.00	\$212.50	Team meeting to discuss updates on motion for summary judgment and motion to seal.
12/02/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to opposing counsel regarding response on confidentiality designations
12/02/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to AIM regarding cite check request.
12/02/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to cite check volunteers.
12/02/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Schedule call with client regarding summary judgment filing.
12/02/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from opposing counsel regarding response to confidentiality designations and draft correspondence to CEG regarding draft response.
12/02/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Conference call with CEG regarding confidentiality designations.
12/02/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to opposing counsel regarding confidentiality designations
12/02/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from opposing counsel and draft proposed response
12/02/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from CEG and draft response regarding response to opposing counsel
12/02/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from AB regarding summary judgment opp CLE and draft response.
12/02/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to CEG regarding response to opposing counsel regarding confidentiality designations
12/02/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from CEG and draft response to SZG regarding work allocation
12/02/2021	Maya S. Jumper	MSJ	1.9	\$475.00	\$902.50	Draft section of opposition brief.
12/02/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from CEG/SZG and draft response regarding status update on summary judgment filing
12/02/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding update on work allocation and draft response
12/02/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review correspondence from CEG/SZG regarding brief revisions and 56.1 statements and draft response regarding status update.
12/02/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG and draft response regarding status update on 56.1 rebuttal
12/02/2021	Maya S. Jumper	MSJ	4.3	\$475.00	\$2,042.50	Draft 56.1 rebuttal.
12/02/2021	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Conference call with CEG/SZG/TAM/BK/VY regarding summary judgment tasks.
12/02/2021	Shira Gelfand	SZG	10.9	\$425.00	\$4,632.50	Team meeting re summary judgment tasks (.6); correspondence with client (.2); Meeting with CEG (.3); Call with MSJ (.2); Continue drafting 56.1 opposition, edit and supplement brief, add in legal and record cites, supplement affirmative 56.1 (9.5).
12/02/2021	Tracee A. Manettas	TAM	0.1	\$350.00	\$35.00	Review correspondence re supplemental exhibit list.
12/02/2021	Tracee A. Manettas	TAM	0.6	\$350.00	\$210.00	Meeting with CEG, GSC, SZG, MSJ, JDX, VXY, BDK re preparation for motion summary judgment filing
12/02/2021	Tracee A. Manettas	TAM	0.1	\$350.00	\$35.00	Correspondence with SZG re compiling performance spreadsheet for CEG declaration to motion summary judgment.
12/02/2021	Tracee A. Manettas	TAM	0.7	\$350.00	\$245.00	Draft performance review comparator chart for CEG declaration to motion summary judgment and correspondence with SZG re same.
12/02/2021	Tracee A. Manettas	TAM	0.5	\$350.00	\$175.00	Update performance review comparator chart for CEG declaration to motion summary judgment and search Nuix re same. Correspondence and telephone conference with SZG re same.
12/02/2021	Tracee A. Manettas	TAM	0.2	\$350.00	\$70.00	Correspondence with SZG re comparator's compensation chart for CEG declaration to motion summary judgment
12/02/2021	Tracee A. Manettas	TAM	0.5	\$350.00	\$175.00	Further update comparator compensation and performance review charts for CEG declaration to motion summary judgment and correspondence with SZG re same.
12/02/2021	Vincent Yang	VXY	0.6	\$325.00	\$195.00	Telephone conference with CEG, GSC, SZG, MSJ, JD, BDK, and TAM re status of summary judgment tasks and updates.
12/02/2021	Vincent Yang	VXY	4.1	\$325.00	\$1,332.50	Review opposition 56.1 exhibits and pull additional exhibits
12/03/2021	Brian D. Kouassi	BDK	0.6	\$325.00	\$195.00	Video conference with MSJ, CEG, GXC, SZG, TAM, and VXY re next steps and preparation for Summary Judgment
12/03/2021	Brian D. Kouassi	BDK	3.2	\$325.00	\$1,040.00	Compile exhibits attached to Plaintiff's Statement of Material Facts.
12/03/2021	Brian D. Kouassi	BDK	0.1	\$325.00	\$32.50	Phone conference with MSJ re exhibits in rebuttal.
12/03/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Phone conference with VXY, CEG, and SZG re numbering of exhibits
12/03/2021	Brian D. Kouassi	BDK	1.1	\$325.00	\$357.50	Video conference with MSJ, CEG, SZG, TAM, and VXY re next steps and preparation for Summary Judgment
12/03/2021	Brian D. Kouassi	BDK	5.6	\$325.00	\$1,820.00	Review and revise Plaintiff's exhibits to the 56.1 Rebuttal.
12/03/2021	Cara E. Greene	CEG	11.9	\$950.00	\$11,305.00	Review and edit Affirmative 56.1 Statement, Opposition 56.1 Statement, Brief, Rowe Declaration, Sealing motion (10.1); telephone call with A. Russ re Harteau declaration (.5); team meetings re project status and staff assignments (1.3).

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
12/03/2021	Gregory S. Chiarello	GSC	1.6	\$800.00	\$1,280.00	Team Zoom call (.4); edit sealing letter, correspondence with JDX re same (.9); correspondence with CEG (.1); correspondence with team (.2).
12/03/2021	Gregory S. Chiarello	GSC	1.9	\$800.00	\$1,520.00	Edit MSJ Opp brief.
12/03/2021	Jennifer Davidson	JDX	0.3	\$425.00	\$127.50	Editing letter opposing sealing.
12/03/2021	NY Law Clerk	NYLC	2.0	\$325.00	\$650.00	[DBX] Case law research on standard for denying summary judgment in NYCHRL pay discrimination claims
12/03/2021	NY Law Clerk	NYLC	2.0	\$325.00	\$650.00	[DBX] Case law research on irrelevance of acts subsequent to the discriminatory action.
12/03/2021	Maya S. Jumper	MSJ	3.5	\$475.00	\$1,662.50	Revise summary judgment brief.
12/03/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Revise rebuttal and draft correspondence to BK regarding exhibits.
12/03/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Conference call with BK regarding exhibit pull and confidentiality designations
12/03/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Conference call with SZG regarding work allocation and revisions to sj brief
12/03/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to CEG/SZG regarding revisions to brief.
12/03/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG to law clerk regarding additional research
12/03/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to AIM regarding additional cite check volunteers.
12/03/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from GCC and draft response regarding confidentiality designations
12/03/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from GCC and draft response regarding confidentiality designations list
12/03/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with CEG/SZG/TAM/BK/VY regarding summary judgment tasks.
12/03/2021	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Conference call with CEG/SZG/TAM/BK/VY regarding summary judgment tasks.
12/03/2021	Maya S. Jumper	MSJ	2.8	\$475.00	\$1,330.00	Revise 56.1 rebuttal statements.
12/03/2021	Maya S. Jumper	MSJ	1.8	\$475.00	\$855.00	Revise and finalize client declaration and draft correspondence to CEG regarding review
12/03/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to GCC regarding list of confidentiality designations.
12/03/2021	Maya S. Jumper	MSJ	3.9	\$475.00	\$1,852.50	Revise brief.
12/03/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG/CEG regarding witness declaration.
12/03/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Circulate revisions to brief.
12/03/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to JD regarding cite check.
12/03/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review file; revise 56.1 statements for additional evidentiary support.
12/03/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG and circulate revised brief.
12/03/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Revise brief with updated edits.
12/03/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to cite checkers regarding update on status of brief.
12/03/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from SZG regarding brief style guide and draft response.
12/03/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Apportion and send cite check sections to volunteers.
12/03/2021	Shira Gelfand	SZG	13.2	\$425.00	\$5,610.00	Team meetings re summary judgment tasks and updates (1.6); meeting with CEG (.3); edit 56.1 opposition, supplement brief, legal research re same (10.9); correspondence re declaration (.3); correspondence with client (.1).
12/03/2021	Tracee A. Manettas	TAM	0.5	\$350.00	\$175.00	Meeting with CEG, GSC, SZG, MSJ, VXY, and BDK re preparation for motion summary judgment filing
12/03/2021	Tracee A. Manettas	TAM	0.5	\$350.00	\$175.00	Convert comparator charts for inclusion in CEG declaration to motion summary judgment
12/03/2021	Tracee A. Manettas	TAM	1.1	\$350.00	\$385.00	Meeting with CEG, SZG, MSJ, BDK and VXY re task list, timing and planning for motion summary judgment filing
12/03/2021	Tracee A. Manettas	TAM	3.7	\$350.00	\$1,295.00	Cross check and edit list of 56.1 Affirmative statement exhibits and pull new exhibits, correspondence with SZG, MSJ, BDK and VXY re same.
12/03/2021	Tracee A. Manettas	TAM	0.1	\$350.00	\$35.00	Save N. Harteau declaration to case file.
12/03/2021	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Telephone conference with CEG, GSC, SZG, MSJ, TAM, and BDK re summary judgment updates and tasks.
12/03/2021	Vincent Yang	VXY	1.1	\$325.00	\$357.50	Telephone conference with CEG, SZG, MSJ, BDK, and TAM re follow-up on summary judgment tasks
12/03/2021	Vincent Yang	VXY	5.4	\$325.00	\$1,755.00	Review 56.1 statement of material facts and update spreadsheet of exhibits list.
12/04/2021	Brian D. Kouassi	BDK	0.6	\$325.00	\$195.00	Video conference with MSJ, CEG, GXC, SZG, TAM, and VXY re next steps and preparation for Summary Judgment
12/04/2021	Brian D. Kouassi	BDK	0.7	\$325.00	\$227.50	Video conference with MSJ, CEG, GXC, SZG, TAM, and VXY re next steps and preparation for Summary Judgment
12/04/2021	Brian D. Kouassi	BDK	6.0	\$325.00	\$1,950.00	Pull and compile transcript cites in the 56.1 Affirmative and Opposition Statements
12/04/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondences with MSJ re missing documents from exhibits folder and compile missing documents
12/04/2021	Brian D. Kouassi	BDK	2.8	\$325.00	\$910.00	Compile missing exhibits and upload to exhibit folder for the 56.1 Affirmative and Opposition Statements
12/04/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondences with MSJ re unable to locate certain documents for exhibits.
12/04/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondences with VXY re unable to locate certain documents for exhibits
12/04/2021	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Correspondences with MSJ, CEG, GXC, SZG, TAM, and VXY re cite references stylistic preferences
12/04/2021	Cara E. Greene	CEG	3.2	\$950.00	\$3,040.00	Review and edit SJ Opposition and Cross motion filing documents and supporting exhibits
12/04/2021	Maya S. Jumper	MSJ	6.3	\$475.00	\$2,992.50	Revise and finalize affirmative 56.1 statement.
12/04/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from VXY/SZG regarding confidential exhibits and draft response
12/04/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Draft correspondence to CEG regarding style guide.
12/04/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to SZG exhibits.
12/04/2021	Maya S. Jumper	MSJ	1.2	\$475.00	\$570.00	Proof and revise brief.
12/04/2021	Maya S. Jumper	MSJ	2.1	\$475.00	\$997.50	Revise affirmative 56.1.
12/04/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Circulate 56.1 affirmative statement to TAM for exhibit review.
12/04/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from TAM/SZG and draft response regarding exhibits.
12/04/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from cite checkers regarding status of cite check.
12/04/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with CEG/SZG/TAM/BK/VY regarding summary judgment tasks.
12/04/2021	Maya S. Jumper	MSJ	0.7	\$475.00	\$332.50	Conference call with CEG/SZG/TAM/BK/VY regarding summary judgment tasks.
12/04/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Review and revise 56.1 rebuttal.
12/04/2021	Maya S. Jumper	MSJ	5.1	\$475.00	\$2,422.50	Proof, add missing cites and apply style edits, and exhibits and confidentiality edits into brief
12/04/2021	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Review confidentiality and designate confidentiality in 56.1 affirmative statement.
12/04/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Conference call with CEG regarding Rowe Decl.
12/04/2021	Maya S. Jumper	MSJ	1.4	\$475.00	\$665.00	Finalize client declaration.
12/04/2021	Shira Gelfand	SZG	10.9	\$425.00	\$4,632.50	Team meeting re summary judgment tasks (1.2); calls with CEG (.4); calls with MSJ (.5); Attention to brief, edit and supplement, edit rebuttal, attention to citations (8.8).
12/04/2021	Tracee A. Manettas	TAM	3.5	\$350.00	\$1,225.00	Draft declaration of CEG to motion summary judgment and cross check exhibits re same.
12/04/2021	Tracee A. Manettas	TAM	0.2	\$350.00	\$70.00	Correspondence with team re exhibits and CEG declaration.
12/04/2021	Tracee A. Manettas	TAM	2.0	\$350.00	\$700.00	Cross check Defendant's exhibit list against 56.1 Opposition exhibits and update citations, correspondence with SZG re same.
12/04/2021	Tracee A. Manettas	TAM	1.2	\$350.00	\$420.00	Edit and check citations in 56.1 opposition brief and correspondence with SZG re same
12/04/2021	Tracee A. Manettas	TAM	0.4	\$350.00	\$140.00	Convert native Excel workbooks to searchable PDF for exhibits to 56.1 opposition motion and correspondence with SZG re same.
12/04/2021	Tracee A. Manettas	TAM	2.0	\$350.00	\$700.00	Meetings, telephone conferences and correspondence with team re motion summary judgment filing tasks.
12/04/2021	Tracee A. Manettas	TAM	0.2	\$350.00	\$70.00	Review Court rules re sealing.
12/04/2021	Vincent Yang	VXY	4.5	\$325.00	\$1,462.50	Insert exhibit numbers for opposition 56.1; apply edits to cites in same; highlight cites for confidentiality in same
12/04/2021	Vincent Yang	VXY	7.8	\$325.00	\$2,535.00	Assign confidentiality designations and exhibit numbers across rebuttal section of 56.1; reconcile exhibit numbers re same; update spreadsheet of exhibits.
12/05/2021	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Video conference with CEG, VXY, SZG, TAM, and MSJ re finalization of documents in Summary Judgement
12/05/2021	Brian D. Kouassi	BDK	0.7	\$325.00	\$227.50	Video conference with CEG, VXY, SZG, TAM, and MSJ re finalization of documents in Summary Judgement
12/05/2021	Brian D. Kouassi	BDK	4.1	\$325.00	\$1,332.50	Finalize exhibits attached to Plaintiff's Affirmative and Opposition 56.1
12/05/2021	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Correspondences with VXY and TAM re transcript excerpts.
12/05/2021	Brian D. Kouassi	BDK	5.0	\$325.00	\$1,625.00	Organize and finalize transcript excerpts.

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
12/05/2021	Brian D. Kouassi	BDK	1.1	\$325.00	\$357.50	Correspondences with SZG re transcript cites updates.
12/05/2021	Brian D. Kouassi	BDK	1.7	\$325.00	\$552.50	Finalize transcript excerpts and exhibits and separating public and sealed exhibits.
12/05/2021	Cara E. Greene	CEG	7.2	\$950.00	\$6,840.00	Review and edit SJ Opposition and Cross motion filing documents and supporting exhibits
12/05/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Conference call with client regarding declaration.
12/05/2021	Maya S. Jumper	MSJ	2.4	\$475.00	\$1,140.00	Incorporate cite checks into brief.
12/05/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from BK and draft response regarding exhibit pull/ID
12/05/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Finalize brief and decl and circulate to client for review and draft correspondence to client regarding status
12/05/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Conference call with CEG regarding objectives for client call and declaration
12/05/2021	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Conference call with CEG/SZG/TAM/BK/VY regarding summary judgment tasks.
12/05/2021	Maya S. Jumper	MSJ	1.2	\$475.00	\$570.00	Review and revise PO, COS, NOM and Ltr to court regarding courtesy copy of CD and circulate to CEG for review
12/05/2021	Maya S. Jumper	MSJ	0.9	\$475.00	\$427.50	Review CEG eds to declaration and revise and finalize.
12/05/2021	Maya S. Jumper	MSJ	2.4	\$475.00	\$1,140.00	Finalize brief and circulate to CEG for review.
12/05/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from CEG regarding review.
12/05/2021	Maya S. Jumper	MSJ	0.7	\$475.00	\$332.50	Revise brief to include final confidentiality highlights and circulate for CEG review
12/05/2021	Maya S. Jumper	MSJ	0.6	\$475.00	\$285.00	Review correspondence from CEG and revise brief and circulate to lit ops for TOC/TOA
12/05/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Conference call with SZG regarding lit support management.
12/05/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Conference call with BK regarding transcript excerpts.
12/05/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Review correspondence from SZG regarding exhibit cuts.
12/05/2021	Maya S. Jumper	MSJ	3.2	\$475.00	\$1,520.00	Review and redact confidential material from all exhibits.
12/05/2021	Maya S. Jumper	MSJ	1.0	\$475.00	\$475.00	Conference call with CEG/SZG/TAM/BK/VY regarding summary judgment tasks.
12/05/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with CEG/SZG regarding summary judgment tasks.
12/05/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with CEG/SZG/TAM/BK/VY regarding summary judgment tasks.
12/05/2021	Maya S. Jumper	MSJ	2.4	\$475.00	\$1,140.00	Revise 56.1 rebuttal exhibits.
12/05/2021	Shira Gelfand	SZG	18.7	\$425.00	\$7,947.50	Summary judgment prep.
12/05/2021	Tracee A. Manettas	TAM	4.0	\$350.00	\$1,400.00	Cross check Defendant's 56.1 motion, update citations in 56.1 opposition motion, update CEG declaration to motion summary judgment and correspondence with team re same.
12/05/2021	Tracee A. Manettas	TAM	14.0	\$350.00	\$4,900.00	Meetings with team re updates on task list for motion summary judgment filing, draft CEG, MJS and SZG declarations for same, pull deposition transcript cites, edit cites, edit exhibit list, edit 56.1 opposition and affirmative statements, redact exhibits, excerpt exhibits, correspondence with team.
12/05/2021	Vincent Yang	VXY	0.7	\$325.00	\$227.50	Telephone conference with CEG, SZG, MSJ, BDK, and TAM re updates and status of summary judgment tasks.
12/05/2021	Vincent Yang	VXY	5.0	\$325.00	\$1,625.00	Reconcile SZG exhibit cuts on opposition 56.1 and spreadsheet to fit exhibit page limitations
12/05/2021	Vincent Yang	VXY	4.0	\$325.00	\$1,300.00	Pull Plaintiff deposition transcripts and exhibit excerpts.
12/05/2021	Vincent Yang	VXY	3.3	\$325.00	\$1,072.50	Apply confidentiality designations to 56.1 statements.
12/06/2021	Brian D. Kouassi	BDK	0.8	\$325.00	\$260.00	Review final version of brief with VXY.
12/06/2021	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Video conference with CEG, VXY, SZG, TAM, and MSJ re finalization of documents in Summary Judgement
12/06/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Video conference with CEG, VXY, SZG, TAM, and MSJ re finalization of documents in Summary Judgement
12/06/2021	Brian D. Kouassi	BDK	4.5	\$325.00	\$1,462.50	Finalize transcript excerpts and exhibits and separating public and sealed exhibits.
12/06/2021	Brian D. Kouassi	BDK	1.0	\$325.00	\$325.00	Draft exhibit slip sheets for public and sealed exhibits.
12/06/2021	Brian D. Kouassi	BDK	1.5	\$325.00	\$487.50	Draft Table of Contents and Table of Authorities for Plaintiff's Memorandum of Law in Opposition to Defendant's Motion for Summary Judgment and Plaintiff's Cross-Motion for Summary Judgment.
12/06/2021	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Phone conference with Veritext re sending transcript of Ulku Rowe
12/06/2021	Brian D. Kouassi	BDK	2.0	\$325.00	\$650.00	Phone conference with VXY re finalizing and review of exhibits
12/06/2021	Brian D. Kouassi	BDK	1.1	\$325.00	\$357.50	Phone conference with VXY re Table of Contents and Table of Authorities for Plaintiff's Memorandum of Law in Opposition to Defendant's Motion for Summary Judgment and Plaintiff's Cross-Motion for Summary Judgment.
12/06/2021	Brian D. Kouassi	BDK	1.1	\$325.00	\$357.50	Correspondences with CEG, VXY, SZG, TAM, and MSJ re updating Rowe brief and finalize production for upcoming filing of Plaintiff's Summary Judgment.
12/06/2021	Brian D. Kouassi	BDK	1.3	\$325.00	\$422.50	Create list of sealed documents for attachment to Letter Motion to Seal.
12/06/2021	Brian D. Kouassi	BDK	2.5	\$325.00	\$812.50	Redact transcripts and exhibits for confidentiality designations.
12/06/2021	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Correspondences with CEG re edits to Letter Motion to Seal.
12/06/2021	Brian D. Kouassi	BDK	0.7	\$325.00	\$227.50	Correspondences with CEG, VXY, SZG, JLM, TAM, and MSJ re upcoming filing to the court
12/06/2021	Cara E. Greene	CEG	14.4	\$950.00	\$13,680.00	Review and edit SJ Opposition and Cross motion filing documents and supporting exhibits; litigation team meetings re same, QC and review for filing all documents.
12/06/2021	Maya S. Jumper	MSJ	19.0	\$475.00	\$9,025.00	Prepare and monitor brief filing.
12/06/2021	Shira Gelfand	SZG	17.2	\$425.00	\$7,310.00	Finalize summary judgment; prepare for filing.
12/06/2021	Tracee A. Manettas	TAM	19.5	\$350.00	\$6,825.00	Draft CEG, MJS and SZG declarations for motion summary judgment, pull and edit transcript cites, pull exhibits, redact and excerpt exhibits, insert slip sheets, various meetings, telephone calls and correspondence with team re filing, finalize documents, create index for exhibits, arrange for hand delivery of CD of same.
12/06/2021	Vincent Yang	VXY	0.7	\$325.00	\$227.50	Review table of contents and table of authorities with BDK re cross motion for summary judgment brief
12/06/2021	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Telephone conference with CEG, SZG, MSJ, BDK, TAM, and JLM re status of summary judgment brief, exhibits, 56.1 statements.
12/06/2021	Vincent Yang	VXY	1.4	\$325.00	\$455.00	Prepare table of contents and table of authorities re memorandum of law in support of cross motion for summary judgment.
12/06/2021	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Telephone conference with CEG, SZG, MSJ, TAM, and BDK re summary judgment task list and updates.
12/06/2021	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Update filing map to reflect documents and order of filing re summary judgment
12/06/2021	Vincent Yang	VXY	8.3	\$325.00	\$2,697.50	Finalize, redact, and excerpt sealing motion and summary judgment exhibits; quality check re same
12/07/2021	Cara E. Greene	CEG	0.7	\$950.00	\$665.00	Post-filing tasks and correspondence calls re same.
12/07/2021	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Reviewing final letter opposition to sealing.
12/07/2021	Jennifer LaMarch	JLM	2.7	\$350.00	\$945.00	Review and test exhibits for court compliance. File motion for summary judgment and motion to seal documents re summary judgment.
12/07/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review correspondence from opposing counsel regarding confidential document and draft correspondence to SZG regarding status update request.
12/07/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Draft correspondence to SZG regarding proposal and contact clerk's office regarding removal of confidential docs from docket.
12/07/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Conference call with SDNY clerks office regarding confirmation of exhibit removal
12/07/2021	Shira Gelfand	SZG	1.4	\$425.00	\$595.00	Call with CEG (.3); Edit and supplement letter to court re CD (.2); correspondence with counsel and team re publicly filed documents and docket (.4); correspondence with client (.2); review docket and documents filed (.3).
12/08/2021	Cara E. Greene	CEG	0.6	\$950.00	\$570.00	Telephone call with client and post-filing follow-up
12/08/2021	Jennifer LaMarch	JLM	0.2	\$350.00	\$70.00	File redacted and sealed exhibits to MSJ declaration.
12/08/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from opposing counsel regarding sealing.
12/08/2021	Maya S. Jumper	MSJ	1.4	\$475.00	\$665.00	Coordinate and finalize emergency removal of confidential document from docket
12/08/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Conference call with client.
12/08/2021	Shira Gelfand	SZG	1.4	\$425.00	\$595.00	Attention to additional redactions and refile; call with client
12/09/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to CEG regarding transition plan and request for meeting
12/09/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Review correspondence from CEG regarding scheduling call on Friday 12/10 and calendar
12/10/2021	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Conference with SZG, MSJ.
12/10/2021	Maya S. Jumper	MSJ	1.1	\$475.00	\$522.50	Review opposing counsel motion to seal.

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
12/10/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to CEG regarding rescheduling transition call.
12/13/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with MSJ re updating case deadlines with new dates from the court.
12/13/2021	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Update case outline with new dates from the court.
12/14/2021	Brian D. Kouassi	BDK	0.9	\$325.00	\$292.50	Download production from Defendant's counsel.
12/14/2021	Brian D. Kouassi	BDK	2.8	\$325.00	\$910.00	Update case folders with recent productions and filings submitted to the court
12/14/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondences with JXD re sending over ECF stamped documents of Plaintiff's Summary Judgment filing
12/14/2021	Brian D. Kouassi	BDK	0.8	\$325.00	\$260.00	Send over ECF stamped documents of Plaintiff's Summary Judgment filing to JXD.
12/14/2021	Brian D. Kouassi	BDK	1.2	\$325.00	\$390.00	Download production from Defendant's counsel re redacted documents.
12/14/2021	Jennifer Davidson	JDX	0.2	\$425.00	\$85.00	Corresponding with CEH and MSJ re: opposition to motion to seal
12/14/2021	Jennifer Davidson	JDX	2.7	\$425.00	\$1,147.50	Drafting opposition to motion to seal.
12/14/2021	Maya S. Jumper	MSJ	2.8	\$475.00	\$1,330.00	Review motion and draft correspondence to JD/CEG/SZG regarding outline of opposition to sealing
12/14/2021	Shira Gelfand	SZG	3.6	\$425.00	\$1,530.00	Review Google's Motion to Seal and attached documents, prepare outline on response strategy for JXD re same (2.8); correspondence with CEG and MSJ same (.3); correspondence with team re motion opposition (.5).
12/15/2021	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Conference re motion to seal and correspondence re same.
12/15/2021	Jennifer Davidson	JDX	5.4	\$425.00	\$2,295.00	Drafting opposition to motion to seal.
12/15/2021	Jennifer Davidson	JDX	0.4	\$425.00	\$170.00	Conference with MSJ CEG and SZG re: motion to seal.
12/15/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Circulate notes to JD and team in preparation for team call.
12/15/2021	Shira Gelfand	SZG	1.1	\$425.00	\$467.50	Attention to motion to seal opposition; team meeting re same.
12/16/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondences with MSJ re upcoming filing to the court and BDK's assistance in production
12/16/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondences with JLM re helping with tomorrow's filing to the court
12/16/2021	Jennifer Davidson	JDX	3.6	\$425.00	\$1,530.00	Drafting opposition to motion to seal.
12/16/2021	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Corresponding with MSJ re: opp to motion to seal.
12/16/2021	Jennifer Davidson	JDX	0.3	\$425.00	\$127.50	Preparing brief for cite check.
12/16/2021	Maya S. Jumper	MSJ	3.3	\$475.00	\$1,567.50	Review and revise opposition to MTC.
12/16/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to JXD regarding cite checkers and timeline for filing
12/16/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to lit ops regarding filing prep.
12/16/2021	Tracee A. Manettas	TAM	0.1	\$350.00	\$35.00	Correspondence with JLM re filing for opposition to motion to seal
12/17/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Phone conference with ALM re TOA/TOC re for upcoming filling of Plaintiff's opposition to Defendant's Motion to Seal.
12/17/2021	Brian D. Kouassi	BDK	5.1	\$325.00	\$1,657.50	Finalize Plaintiff's Opposition to Defendant's Motion to Seal.
12/17/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	TOA/TOC review with ALM re Opposition brief.
12/17/2021	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Correspondences with JLM, MSJ, and JXD re finalization of filing and ready to submit to the court
12/17/2021	Cara E. Greene	CEG	2.1	\$950.00	\$1,995.00	Review and edit sealing brief, review related documents.
12/17/2021	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Corresponding with SZG re: opp to motion to seal.
12/17/2021	Jennifer Davidson	JDX	2.2	\$425.00	\$935.00	Revising opposition to motion to seal.
12/17/2021	Jennifer Davidson	JDX	0.3	\$425.00	\$127.50	Corresponding with BDK re: filing motion to seal.
12/17/2021	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Corresponding with MSJ re: finalizing filing.
12/17/2021	Jennifer LaMarch	JLM	0.2	\$350.00	\$70.00	File opposition to motion to seal.
12/17/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Circulate revised opp brief to CEG for review.
12/17/2021	Maya S. Jumper	MSJ	0.3	\$475.00	\$142.50	Draft correspondence to JXD regarding draft feedback and edits and next steps on filing
12/17/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from CEG regarding page limits and draft response.
12/17/2021	Maya S. Jumper	MSJ	0.2	\$475.00	\$95.00	Review correspondence from CEG regarding edits to brief and draft response.
12/17/2021	Maya S. Jumper	MSJ	0.1	\$475.00	\$47.50	Draft correspondence to JXD regarding cite checks and TOC/TOA.
12/17/2021	Maya S. Jumper	MSJ	0.4	\$475.00	\$190.00	Review correspondence from JXD and draft correspondence to BDK regarding TOC/TOA
12/17/2021	Maya S. Jumper	MSJ	1.6	\$475.00	\$760.00	Revise and finalize brief.
12/17/2021	Maya S. Jumper	MSJ	0.5	\$475.00	\$237.50	Monitor and coordinate filing.
12/17/2021	Shira Gelfand	SZG	0.8	\$425.00	\$340.00	Attention to motion to seal opposition and filing.
12/20/2021	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondences with MSJ re drafting MSJ's Motion to Withdrawal.
12/20/2021	Brian D. Kouassi	BDK	0.8	\$325.00	\$260.00	Draft MSJ's Motion to Withdrawal.
12/20/2021	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with SZG re updating case date outline re new dates form the court.
12/20/2021	Brian D. Kouassi	BDK	0.9	\$325.00	\$292.50	Update case date outline re new dates form the court.
12/20/2021	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence with opposing counsel and SZG re SJ deadlines.
12/20/2021	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Conference with SZG re next steps.
12/20/2021	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Reviewing corrected exhibits to motion for summary judgment.
12/20/2021	Shira Gelfand	SZG	1.8	\$425.00	\$765.00	Correspondence with counsel; confer with team re deadline; review defendant's letter re extension; review defendant's filing re exhibits; call with CEG re Reply internal schedule; correspondence with client.
12/21/2021	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence with JDX re sealing motions.
12/21/2021	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Corresponding with CEG re: motion to seal.
12/21/2021	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Correspondence re motion to seal.
12/21/2021	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Save Court orders to case file.
12/24/2021	Shira Gelfand	SZG	1.1	\$425.00	\$467.50	Correspondence with CEG re page limitations; review defendant's MOL; review Court rules.
12/27/2021	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Edit Plaintiff's letter to court; correspondence re motion to strike 56.1 reply
12/27/2021	Jennifer LaMarch	JLM	0.2	\$350.00	\$70.00	File letter re page limits.
12/27/2021	Shira Gelfand	SZG	7.9	\$425.00	\$3,357.50	Review Defendant's reply briefing and exhibits (2.4); correspondence with client (.1); correspondence with JXD re motion to seal (.2); calls with CEG (.3); draft two letters to court re ordering def to comply with page limitation (1.6); attention to defendant's letter (.3); correspondence with paralegals re FTP to client (.2); conduct research and draft letter motion re motion to strike (3.8).
12/27/2021	Tracee A. Manettas	TAM	0.1	\$350.00	\$35.00	Format letter to Court and correspondence with SZG re same.
12/27/2021	Tracee A. Manettas	TAM	0.2	\$350.00	\$70.00	Save Plaintiff's and Defendant's letters to Court to case file.
12/27/2021	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Save Defendant summary judgment reply and motion to seal papers to case file; send re same to Plaintiff U. Rowe via FTP.
12/27/2021	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Finalize letter to Court re page limitation.
12/28/2021	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Corresponding with SZG re: opposition to motion to seal.
12/28/2021	Jennifer Davidson	JDX	0.2	\$425.00	\$85.00	Reviewing defendant's third motion to seal.
12/28/2021	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Reviewing Google's third motion to seal.
12/28/2021	Jennifer Davidson	JDX	0.7	\$425.00	\$297.50	Researching and drafting opposition to Google's third motion to seal.
12/28/2021	Shira Gelfand	SZG	5.8	\$425.00	\$2,465.00	Prep for and attend client call (.3); Continue drafting pre-motion letter re motion to strike (2.4); review court order and call with CEG re same (.4); edit pre-motion letter (2.7).
12/29/2021	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Corresponding with SZG re: motion to seal.
12/29/2021	Shira Gelfand	SZG	2.1	\$425.00	\$892.50	Correspondence with CEG; review Reply 56.1 and continue drafting motion to strike letter
12/29/2021	Tracee A. Manettas	TAM	0.1	\$350.00	\$35.00	Save order from docket to case file.
12/30/2021	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Review and edit letter motion to strike.
12/30/2021	Jennifer LaMarch	JLM	0.2	\$350.00	\$70.00	File letter requesting pre-motion conference.
12/30/2021	Shira Gelfand	SZG	0.8	\$425.00	\$340.00	Finish editing and drafting letter motion re motion to strike; prepare for filing
12/30/2021	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Finalize letter to Court re pre-motion conference.
01/03/2022	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Reviewing letter briefing requesting hearing re: motion to strike.

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
01/03/2022	Jennifer Davidson	JDX	0.3	\$425.00	\$127.50	Researching and drafting opposition to Google's third motion to seal.
01/03/2022	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with client.
01/05/2022	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Finalize MSJ's Motion to Withdrawal.
01/05/2022	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Correspondences with JLM re filing MSJ's Motion to Withdrawal.
01/05/2022	Jennifer LaMarch	JLM	0.2	\$350.00	\$70.00	File notice of withdrawal of appearance of MSJ.
01/06/2022	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Correspondences with SZG re sending documents to client for review.
01/06/2022	Brian D. Kouassi	BDK	0.9	\$325.00	\$292.50	Download production from Defendant's counsel.
01/06/2022	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondences with client re document production from Defendant's counsel
01/06/2022	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Corresponding with SZG re: motion to seal.
01/06/2022	Jennifer Davidson	JDX	0.7	\$425.00	\$297.50	Researching and drafting opposition to Google's third motion to seal.
01/06/2022	Shira Gelfand	SZG	5.9	\$425.00	\$2,507.50	Review Google's SJ Reply/Opp filing, motion to seal, Aff 56.1 response and exhibits (2.6). correspondence with CEG (.2); correspondence with client (.1); correspondence with paralegals and attention to FTP to client (.2); begin outline for brief call with CEG re same (2.8).
01/07/2022	Cara E. Greene	CEG	2.8	\$950.00	\$2,660.00	Review brief; telephone call with SEG re same.
01/07/2022	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Reviewing Google's opp to motion to strike letter.
01/07/2022	Jennifer Davidson	JDX	0.2	\$425.00	\$85.00	Corresponding with SZG re: third motion to seal.
01/07/2022	Jennifer Davidson	JDX	2.6	\$425.00	\$1,105.00	Researching and drafting opposition to Google's third motion to seal.
01/07/2022	Shira Gelfand	SZG	6.8	\$425.00	\$2,890.00	Review memo re motion to seal, outline arguments; correspondence with team re same (1.8); call with CEG (.2); begin drafting Reply brief (3.7); review motion to strike filing (1.1).
01/09/2022	Shira Gelfand	SZG	4.7	\$425.00	\$1,997.50	Continue drafting reply brief, correspondence with client and review of client document
01/10/2022	Jennifer Davidson	JDX	0.6	\$425.00	\$255.00	Researching and drafting opposition to Google's third motion to seal.
01/11/2022	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondences with SZG and VXY re exhibits filed during Summary Judgment.
01/11/2022	Brian D. Kouassi	BDK	0.7	\$325.00	\$227.50	Review exhibits filed during summary judgment.
01/11/2022	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Conference with client re SJ filings.
01/11/2022	Shira Gelfand	SZG	7.8	\$425.00	\$3,315.00	Call with client (.5); Correspondence with CEG re reply brief (.4); Draft reply brief and conduct research re same (6.7); correspondence with paralegals re exhibit page limit (.2).
01/11/2022	Vincent Yang	VXY	0.8	\$325.00	\$260.00	Quality check re page count on motion for summary judgment exhibits.
01/12/2022	Cara E. Greene	CEG	2.3	\$950.00	\$2,185.00	Review opposing brief outline and edit.
01/12/2022	Jennifer Davidson	JDX	0.4	\$425.00	\$170.00	Researching and drafting opposition to Google's third motion to seal.
01/12/2022	Shira Gelfand	SZG	8.3	\$425.00	\$3,527.50	Continue drafting reply brief.
01/13/2022	Shira Gelfand	SZG	5.8	\$425.00	\$2,465.00	Continue drafting Reply brief, research re same, send to CEG.
01/14/2022	Shira Gelfand	SZG	3.3	\$425.00	\$1,402.50	Review motion to seal and JXD opposition draft; correspondence with CEG.
01/17/2022	Shira Gelfand	SZG	5.3	\$425.00	\$2,252.50	Begin drafting Reply 56.1.
01/18/2022	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Conference call with SZG re reply brief.
01/18/2022	Shira Gelfand	SZG	4.2	\$425.00	\$1,785.00	Continue drafting Reply 56.1; check in meeting with CEG.
01/19/2022	Brian D. Kouassi	BDK	0.5	\$325.00	\$162.50	Correspondences with SZG re Draft Memo. of Law in Support of Plaintiff's Opposition to Defendant's Motion to Seal.
01/19/2022	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondences with JLM re filing of Memo. of Law in Support of Plaintiff's Opposition to Defendant's Motion to Seal.
01/19/2022	Brian D. Kouassi	BDK	3.0	\$325.00	\$975.00	Finalize Memo. of Law in Support of Plaintiff's Opposition to Defendant's Motion to Seal
01/19/2022	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Review sealing brief and edit.
01/19/2022	Gregory S. Chiarello	GSC	0.2	\$800.00	\$160.00	Conference with CEG re motion to seal strategy.
01/19/2022	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Reviewing edits to motion to seal.
01/19/2022	Jennifer LaMarch	JLM	0.3	\$350.00	\$105.00	File opposition to motion to seal.
01/19/2022	Shira Gelfand	SZG	3.4	\$425.00	\$1,445.00	Attn to motion to seal opposition filing; review Def's opp 56.1 and draft objections for brief
01/19/2022	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Create table of authorities re opposition to motion to seal.
01/19/2022	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Review table of contents and table of authorities with BDK re opposition to motion to seal
01/20/2022	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Conference with SZG re reply brief.
01/20/2022	Shira Gelfand	SZG	2.5	\$425.00	\$1,062.50	Call with CEG (.2); review Opp and Reply 56.1 and draft section of brief re same (2.3)
01/21/2022	Cara E. Greene	CEG	0.6	\$950.00	\$570.00	Review reply brief.
01/24/2022	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondences with CEG re pulling docket items for review.
01/24/2022	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Search and pull docket items for attorney's review.
01/24/2022	Cara E. Greene	CEG	4.1	\$950.00	\$3,895.00	Review opposing brief and 561 statements, edit reply.
01/24/2022	Shira Gelfand	SZG	4.3	\$425.00	\$1,827.50	Review CEG edits to brief, edit brief and add citations (3.7); review of exhibits and confidentiality designations (.5); correspondence with team re same (.1).
01/25/2022	Cara E. Greene	CEG	4.8	\$950.00	\$4,560.00	Review, edit and bluebook brief; review letter to court and correspondence re same
01/25/2022	Shira Gelfand	SZG	6.8	\$425.00	\$2,890.00	Draft letter motion re sealing (1.3); draft letter to court re oral arguments (.8); call with CEG re brief (.3); correspondence with paralegals re filing prep (.2); attention to confidentiality designations and exhibits (2.3); draft letter re relief of declarations and page limits (2.1).
01/25/2022	Tracee A. Manettas	TAM	0.2	\$350.00	\$70.00	Correspondence with SZG, BDK and VXY re draft reply brief and exhibits
01/25/2022	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Prepare exhibits and declaration re reply brief in support of motion for summary judgment
01/26/2022	Brian D. Kouassi	BDK	0.2	\$325.00	\$65.00	Video conference with VXY re TOA/TOC.
01/26/2022	Brian D. Kouassi	BDK	1.3	\$325.00	\$422.50	Finalize exhibits to Plaintiff's Reply for Summary Judgment re Memorandum of Law
01/26/2022	Brian D. Kouassi	BDK	1.7	\$325.00	\$552.50	Finalize Plaintiff's Reply in Support of Her Partial Motion for Summary Judgment
01/26/2022	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Update docket folder with recent filings from the court.
01/26/2022	Jennifer LaMarch	JLM	0.5	\$350.00	\$175.00	File reply in support of partial summary judgment, letter motion for additional declaration and letters re sealing and ora argument.
01/26/2022	Shira Gelfand	SZG	5.3	\$425.00	\$2,252.50	Attention to SJ Reply filing.
01/26/2022	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Review table of contents and table of authorities re reply brief with BDK
01/26/2022	Vincent Yang	VXY	2.1	\$325.00	\$682.50	Finalize and add table of authorities and table of contents to reply memorandum of law in support for motion for summary judgment.
01/27/2022	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Reviewing defendant's reply in support of sealing motion.
01/27/2022	Shira Gelfand	SZG	0.3	\$425.00	\$127.50	Correspondence with team and attention to CD to judge.
01/27/2022	Tracee A. Manettas	TAM	0.1	\$350.00	\$35.00	Review correspondence re courtesy copies to Court.
01/28/2022	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence with SZG re courtesy filings.
01/28/2022	Shira Gelfand	SZG	0.7	\$425.00	\$297.50	Correspondence with CEG re court rules (.2); review Google motion to seal (.4); correspondence with client (.1)
01/31/2022	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Corresponding with SZG re: Google's motion to seal.
01/31/2022	Jennifer Davidson	JDX	0.6	\$425.00	\$255.00	Researching and drafting opposition to motion to seal.
01/31/2022	Shira Gelfand	SZG	0.5	\$425.00	\$212.50	Review Judge's orders (.2); correspondence with CEG re same (.1); correspondence with JXD re motion to seal opp. (.2).
01/31/2022	Tracee A. Manettas	TAM	0.3	\$350.00	\$105.00	Save Defendant documents from docket to case file.
02/01/2022	Brian D. Kouassi	BDK	0.3	\$325.00	\$97.50	Correspondences with SZG re saving recent docket items and update case calendar.
02/01/2022	Brian D. Kouassi	BDK	0.4	\$325.00	\$130.00	Update docket folder and docket calendar.
02/01/2022	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Review court order re mag judge.
02/02/2022	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Review Defendant's submitted letter; correspondence with CEG re same.
02/03/2022	Jennifer Davidson	JDX	0.8	\$425.00	\$340.00	Researching and drafting opposition to motion to seal.

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
02/03/2022	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with CEG re sealing letter.
02/03/2022	Tracee A. Manettas	TAM	0.1	\$350.00	\$35.00	Save documents from docket to case file.
02/07/2022	Cara E. Greene	CEG	1.7	\$950.00	\$1,615.00	Review SJ reply and supporting docs; review draft sealing motion.
02/07/2022	Jennifer Davidson	JDX	0.4	\$425.00	\$170.00	Researching and drafting opposition to motion to seal.
02/08/2022	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with client.
02/10/2022	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence re sealing motion.
02/10/2022	Jennifer Davidson	JDX	0.2	\$425.00	\$85.00	Corresponding with CEG re: motion to seal.
02/11/2022	Cara E. Greene	CEG	1.1	\$950.00	\$1,045.00	Review and finalize sealing motion.
02/11/2022	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Corresponding with TEM re: motion to seal.
02/11/2022	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Reviewing motion to seal.
02/11/2022	Jennifer LaMarch	JLM	0.2	\$350.00	\$70.00	File opposition to motion to seal.
02/11/2022	Tracee A. Manettas	TAM	0.4	\$350.00	\$140.00	Correspondence with CEG, JDX and VXY re reply to opposition to sealing motion draft
02/11/2022	Tracee A. Manettas	TAM	0.1	\$350.00	\$35.00	Correspondence with CEG, VXY and JLM re filing reply to opposition to motion to seal
02/11/2022	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Finalize opposition to motion to seal; correspondence with CEG re same
02/14/2022	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Review filing.
02/14/2022	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with client.
02/17/2022	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with client.
02/18/2022	Shira Gelfand	SZG	0.3	\$425.00	\$127.50	Review Defendant's reply ISO motion to seal.
02/22/2022	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with client.
02/22/2022	Tracee A. Manettas	TAM	0.1	\$350.00	\$35.00	Save Defendant's documents from docket to case file.
02/28/2022	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with client.
03/07/2022	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence with client.
03/07/2022	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with client.
03/08/2022	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Telephone call with client; correspondence re same.
03/08/2022	Shira Gelfand	SZG	0.5	\$425.00	\$212.50	Call with client and review of proposed correspondence to manager
03/09/2022	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence with client.
03/17/2022	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence with client.
03/21/2022	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with client.
04/19/2022	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with client.
04/21/2022	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with client.
05/24/2022	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Correspondence with client re case status.
05/24/2022	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Corr. with client.
06/13/2022	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence with client re Ellis class action settlement and application
06/13/2022	Cara E. Greene	CEG	1.3	\$950.00	\$1,235.00	Review findings of security expert, telephone call with same (.5); correspondence with client and security expert re recent activity (.4); coordinate scheduling of meeting with expert and analyst and correspondence with WNO re same (.4).
08/15/2022	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspondence with NXZ re scheduling check-in on case.
08/16/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Conference with VXY re matter background, status, and upcoming projects.
08/16/2022	Vincent Yang	VXY	0.6	\$325.00	\$195.00	Telephone conference with NXZ re case summary and check-in.
09/14/2022	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with client.
09/15/2022	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence with client.
09/26/2022	Jennifer Davidson	JDX	0.2	\$425.00	\$85.00	Reviewing court's decision re: motions to seal.
09/26/2022	Shira Gelfand	SZG	1.7	\$425.00	\$722.50	Review SJ decision; correspondence re same.
09/26/2022	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Save opinion re motion for summary judgment in case file.
09/26/2022	Vincent Yang	VXY	1.1	\$325.00	\$357.50	Download witness deposition transcripts and update tracker re same; organize case file re deposition transcripts
09/27/2022	Cara E. Greene	CEG	1.1	\$950.00	\$1,045.00	Review summary judgment and correspondence re same.
09/27/2022	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Reviewing court's summary judgment decision.
09/27/2022	Shira Gelfand	SZG	1.3	\$425.00	\$552.50	Review order re motion to seal; correspondence with client and CEG; review article re SJ decision
09/27/2022	Tracee A. Manettas	TAM	0.1	\$350.00	\$35.00	Correspondence with docketing team re calendaring court ordered dates.
09/28/2022	Jennifer Davidson	JDX	0.3	\$425.00	\$127.50	Reviewing summary judgment opinion.
09/28/2022	Shira Gelfand	SZG	0.4	\$425.00	\$170.00	Correspondence with client; internal correspondence re SJ decision; correspondence with counsel and review letter to court.
09/28/2022	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Calendar deadline to submit letter re referral.
09/29/2022	Cara E. Greene	CEG	0.6	\$950.00	\$570.00	Telephone call with client re SJ decision and conference with SZG re same
09/29/2022	Shira Gelfand	SZG	1.2	\$425.00	\$510.00	Call with client; review of document filings; correspondence with team
09/29/2022	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Save letter motion to case file.
09/29/2022	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Update calendar entry to file letter.
09/30/2022	Vincent Yang	VXY	1.9	\$325.00	\$617.50	Review sealing order and sort document exhibits re sealing approval; create index re same.
10/03/2022	Cara E. Greene	CEG	1.1	\$950.00	\$1,045.00	Correspondence with opposing counsel re trial dates (.1); memo to lit ops team re upcoming pre-trial tasks (.5); correspondence re comparators and review information re same (.6).
10/03/2022	Shira Gelfand	SZG	0.4	\$425.00	\$170.00	Correspondence with team; review docs re comparators.
10/03/2022	Tracee A. Manettas	TAM	0.3	\$350.00	\$105.00	Call with RRR re staffing.
10/04/2022	Shira Gelfand	SZG	1.4	\$425.00	\$595.00	Begin review of unsealed documents.
10/05/2022	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Call with SZG re trial tasks.
10/06/2022	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Telephone call with GSC re comparators.
10/06/2022	Cara E. Greene	CEG	0.1	\$950.00	\$95.00	Follow-up with opposing counsel re pre-trial schedule
10/07/2022	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Conference with client re status and prepare for same.
10/07/2022	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Correspondence with client re settlement negotiations and letter to court; review letter to court; correspondence with client re same.
10/07/2022	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with counsel.
10/07/2022	Shira Gelfand	SZG	0.5	\$425.00	\$212.50	Meeting with client and CEG; correspondence with counsel; review joint letter.
10/14/2022	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Review scheduling order, correspondence re same..
10/14/2022	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Call with CEG; review of order re trial dates.
10/17/2022	Cara E. Greene	CEG	2.6	\$950.00	\$2,470.00	Trial planning meeting (1.2); research re experts (.4); correspondence with opposing counsel re mediation (.2) draft memo to litigation ops team re process for preparing exhibit list (.4); correspondence re trial tasks (.4).
10/17/2022	Gregory S. Chiarello	GSC	1.0	\$800.00	\$800.00	Team call with CEG, SZG re trial preparation.
10/17/2022	Sylvie Rohrbaugh	SXR	0.2	\$325.00	\$65.00	Conference with VXY re case rundown.
10/17/2022	Shira Gelfand	SZG	0.8	\$425.00	\$340.00	Team meeting; correspondence with team; correspondence with counsel.
10/17/2022	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Conference with SXR re case rundown.
10/17/2022	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspondence with CEG re trial prep.
10/17/2022	Vincent Yang	VXY	0.9	\$325.00	\$292.50	Review Nuix documents, summary judgment documents, and deposition exhibits to provide CEG document count
10/18/2022	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Correspondence re mediation; correspondence with litigation ops re exhibit binders and upcoming trials
10/18/2022	Gregory S. Chiarello	GSC	0.1	\$800.00	\$80.00	Correspondence with Lit Ops re trial preparation.
10/18/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with VXY re assistance for trial prep in advance of upcoming trial (181045-000001)
10/18/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Conference with VXY re trial prep projects and upcoming deadlines
10/18/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Review and compile notes re conference with VXY re trial prep projects and upcoming deadlines

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10/18/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Correspondence with VXY and GHK re drafting templates for proposed pre-trial order, voir dire, jury charge, verdict form and motions in limine (181045-000001).
10/18/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Pull most recent SDNY proceedings calendar to identify upcoming trials for Judge Schofield that will appear in court prior to our upcoming trial.
10/18/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Pull most recent SDNY proceedings calendar to identify upcoming trials for Judge Schofield that will appear in court prior to upcoming trial.
10/18/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with JLM, GSC, SZG, CEG, and RRX re calendaring trial prep deadlines triggered by trial scheduling order of upcoming trial.
10/18/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Organize emails re projects, status updates and meeting scheduling in advance of upcoming trial (181045-000001)
10/18/2022	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Telephone conference with NAZ re projects.
10/18/2022	Vincent Yang	VXY	1.1	\$325.00	\$357.50	Assemble full motion for summary judgment briefing and coordinate with office services to print for GC review
10/18/2022	Vincent Yang	VXY	1.4	\$325.00	\$455.00	Review relevant hot documents and provide CEG with document count.
10/18/2022	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Telephone conference with office services re printing binder
10/19/2022	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Correspondence re mediation.
10/19/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with VXY re deposition materials, and binder setup in advance of preparing binders for attorney review and analysis.
10/19/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re meeting with VXY re deposition materials, and binder setup in advance of preparing binders for attorney review and analysis.
10/19/2022	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Begin preparing binders containing deposition digests and transcripts for attorney review and analysis
10/19/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Begin preparing binders containing deposition digests and transcripts for attorney review and analysis (181045-000001).
10/19/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Convert full deposition transcripts to mimic mini transcript format in advance of preparing binders containing deposition digests and transcripts for attorney review and analysis (181045-000001).
10/19/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with CEG, RRX, VXY, GSC, and SZG regarding binder setup in advance of preparing binders containing deposition digests and transcripts for attorney review and analysis (181045-000001).
10/20/2022	Cara E. Greene	CEG	0.9	\$950.00	\$855.00	Correspondence with N. Ostroff re expert work and research same (.4); litigation team meeting (.5)
10/20/2022	Gregory S. Chiarello	GSC	1.3	\$800.00	\$1,040.00	Team meeting with CEG, SZG re potential mediation, GSC role in trial, and trial planning
10/20/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting with VXY re tasks and projects for trial prep.
10/20/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with RRX re example of index to use for trial exhibit list (181045-000001)
10/20/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re meeting with VXY re tasks and projects for trial prep
10/20/2022	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Prepare Notice of appearance for GSC (181045-001)
10/20/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and compile notes re meeting with VXY re tasks and projects for trial prep (181045-001)
10/20/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with RRX re QC of produced documents to determine whether or not all of them are in Nuix, and creation of production log.
10/20/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re meeting with RRX re QC of produced documents to determine whether or not all of them are in Nuix, and creation of production log.
10/20/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with VXY re location of potential trial exhibits within Nuix database (181045-000001)
10/20/2022	Napoleon Zapata	NAZ	1.3	\$325.00	\$422.50	Continue preparing binders containing deposition digests and transcripts for attorney review and analysis
10/20/2022	Shira Gelfand	SZG	1.2	\$425.00	\$510.00	Team meeting and correspondence with client; correspondence re expert
10/20/2022	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Conference with NAZ re drafting notice of appearance and binders for CEG
10/21/2022	Amanda T. Chan	ATC	0.2	\$375.00	\$75.00	Conference with GSC re legal research assignment re damages.
10/21/2022	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Correspondence re mediation; memo to lit ops re mediation strategy and tasks.
10/21/2022	Gregory S. Chiarello	GSC	0.3	\$800.00	\$240.00	JAMS mediation agreement (.1); conference with ATC re research assignments (.2).
10/21/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re conference with RRX re organizing, staging, and communications with printing vendor re printing for upcoming binders for attorney review and analysis (181045-001).
10/21/2022	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Conference with VXY, RRX, and TAM re VXY out of office coverage, project status, and projects related to trial prep (181045-000001).
10/21/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with GHX re preparing documents for printing in advance of preparing binders for attorney review and analysis (181045-000001).
10/21/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Correspondence with GHV, RRX, and VXY re preparing documents for printing in advance of preparing binders for attorney review and analysis (181045-000001).
10/21/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Conference with sitelogsitix re preparing binders for attorney review and analysis (181045-000001)
10/21/2022	Napoleon Zapata	NAZ	1.4	\$325.00	\$455.00	Correspondence with sitelogsitix, VXY, and RRX re preparing binders for attorney review and analysis (181045-000001).
10/21/2022	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Conference with RRX re workflow to compile documents to pull for binders containing potential trial exhibits for attorney review and analysis.
10/21/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Review and compile notes re conference with RRX re workflow to compile documents to pull for binders containing potential trial exhibits for attorney review and analysis.
10/21/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Correspondence with VXY re workflow to compile documents to pull for binders containing potential trial exhibits for attorney review and analysis.
10/21/2022	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Correspondence with sitelogsitix, VXY, and RRX re preparing binders for attorney review and analysis
10/21/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Conference with GHX re preparing documents for printing in advance of preparing binders for attorney review and analysis (181045-000001).
10/21/2022	Napoleon Zapata	NAZ	1.6	\$325.00	\$520.00	Finalize and QC binders containing deposition digests and transcripts for attorney review and analysis
10/21/2022	Napoleon Zapata	NAZ	1.5	\$325.00	\$487.50	Begin preparing cross reference to identify documents to pull for binders containing potential trial exhibits for attorney review and analysis.
10/21/2022	Naomi Campusano	NCX	0.2	\$350.00	\$70.00	Conference with GHK and ERA re running load file search in Nuix
10/21/2022	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with client re meeting scheduling.
10/21/2022	Vincent Yang	VXY	1.7	\$325.00	\$552.50	Pull documents for binder re expert review.
10/21/2022	Vincent Yang	VXY	0.6	\$325.00	\$195.00	Conference with RRX, TAM, and NAZ re projects and trial prep
10/21/2022	Vincent Yang	VXY	2.6	\$325.00	\$845.00	Prepare template draft voir dire, jury instructions, pretrial order, and motions in limine for pretrial filing prep
10/21/2022	Vincent Yang	VXY	0.6	\$325.00	\$195.00	Pull potential trial exhibits per CEG correspondence re binder sets
10/21/2022	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspondence with NAZ re pretrial tasks to complete for CEG.
10/22/2022	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Correspondence with RRX, and TAM re status updates and updated workflow for preparing cross reference to identify documents to pull for binders containing potential trial exhibits for attorney review and analysis.
10/22/2022	Napoleon Zapata	NAZ	5.6	\$325.00	\$1,820.00	Continue preparing cross reference to identify documents to pull for binders containing potential trial exhibits for attorney review and analysis.
10/22/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Conference with RRX re status updates and updated workflow for preparing cross reference to identify documents to pull for binders containing potential trial exhibits for attorney review and analysis.
10/22/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re conference with RRX re status updates and updated workflow for preparing cross reference to identify documents to pull for binders containing potential trial exhibits for attorney review and analysis.
10/23/2022	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Continue preparing cross reference to identify documents to pull for binders containing potential trial exhibits for attorney review and analysis.
10/23/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Conference with RRX re status updates and updated workflow for preparing cross reference to identify documents to pull for binders containing potential trial exhibits for attorney review and analysis.

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10/23/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and compile notes re conference with RRR re status updates and updated workflow for preparing cross reference to identify documents to pull for binders containing potential trial exhibits for attorney review and analysis.
10/23/2022	Napoleon Zapata	NAZ	1.4	\$325.00	\$455.00	Review and compile notes re creating cross reference to identify documents to pull for binders containing potential trial exhibits for attorney review and analysis (181045-000001).
10/23/2022	Shira Gelfand	SZG	4.7	\$425.00	\$1,997.50	Draft mediation statement and damages calculation.
10/24/2022	Amanda T. Chan	ATC	1.1	\$375.00	\$412.50	Legal research re the standard for liquidation damages under the New York Equal pay Act
10/24/2022	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Telephone call with expert.
10/24/2022	Napoleon Zapata	NAZ	2.0	\$325.00	\$650.00	Continue preparing cross reference to identify documents to pull for binders containing potential trial exhibits for attorney review and analysis.
10/24/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re creating cross reference to identify documents to pull for binders containing potential trial exhibits for attorney review and analysis (181045-000001).
10/24/2022	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Meeting with RRR re workflow for updating cross reference to identify documents to pull for binders containing potential trial exhibits for attorney review and analysis.
10/24/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting with ERA re workflow for creating index for binders containing potential trial exhibits for attorney review and analysis.
10/24/2022	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Correspondence with RRR, TAM, and Transperfect contacts re preparing Set 1 binders containing potential trial exhibits for attorney review and analysis.
10/24/2022	Napoleon Zapata	NAZ	1.7	\$325.00	\$552.50	Prepare and finalize documents for Set 1 binders containing potential trial exhibits for attorney review and analysis
10/24/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with ERA re workflow for creating index for binders containing potential trial exhibits for attorney review and analysis.
10/24/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Meeting with SZG re status updates, and documents to pull for binders containing potential trial exhibits for attorney review and analysis.
10/24/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and compile notes re meeting with SZG re status updates, and documents to pull for binders containing potential trial exhibits for attorney review and analysis.
10/24/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with ERA, RRR, and TAM re workflow for removing exhibits cited in motions from documents tagged as Hot.
10/24/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting with RRR re workflow for removing exhibits cited in motions from documents tagged as Hot
10/24/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with ERA re workflow for removing exhibits cited in motions from documents tagged as Hot
10/24/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with SZG re status updates of Set 2 binders containing potential trial exhibits for attorney review and analysis.
10/24/2022	Napoleon Zapata	NAZ	2.0	\$325.00	\$650.00	Prepare update to cross reference to identify documents to pull for binders containing potential trial exhibits for attorney review and analysis.
10/24/2022	Shira Gelfand	SZG	7.3	\$425.00	\$3,102.50	Draft mediation statement (6.6); call with CEG (.2); call with expert (.5).
10/25/2022	Amanda T. Chan	ATC	0.4	\$375.00	\$150.00	Confer with GSC re legal memo on liquidated damages (0.2); make edits to legal memo per GSC instructions (0.2)
10/25/2022	Cara E. Greene	CEG	1.2	\$950.00	\$1,140.00	Conference with GSC re comparators, trial planning.
10/25/2022	Daniel Stromberg	DXS	0.2	\$875.00	\$175.00	Assess document report and assembly request and advise NAZ re: timelines for Nuix processes.
10/25/2022	Gregory S. Chiarello	GSC	3.5	\$800.00	\$2,800.00	Conference with CEG re comparators, mediation, trial strategy (1.5); review MSJ papers and decision, comparator information (1.4); review NYEPL legal research and conference with ATC re same (.6).
10/25/2022	Hector Jacome	HJ	0.5	\$150.00	\$75.00	Assisted in the preparation of binders/ Transperfect Legal Solutions delivery
10/25/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Correspondence with ERA, RRR, and TAM re workflow of documents exported from Nuix for Set 2 binders for attorney review and analysis.
10/25/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Correspondence with Nuix Admin Team, RRR, and TAM re setup of report to run, and update for Set 2 binder index
10/25/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting with ERA re documents exported from Nuix for Set 2 binders for attorney review and analysis
10/25/2022	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Assembled, and QC'd Set 1 binders for attorney review and analysis.
10/25/2022	Napoleon Zapata	NAZ	2.0	\$325.00	\$650.00	Prepare and finalize contents of Set 2 binders in advance of sending to Transperfect for printing
10/25/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meeting with RRR re workflow for preparing and finalizing contents of Set 2 binders
10/25/2022	Napoleon Zapata	NAZ	0.9	\$325.00	\$292.50	Correspondence and calls with Transperfect, RRR, and TAM re preparation, status, and delivery of Set 1 binders for attorney review and analysis (181045-001).
10/25/2022	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Correspondence and calls with Transperfect, RRR, and TAM re preparation, status, and delivery of Set 2 binders for attorney review and analysis (181045-001).
10/25/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with RRR re setup of binder index for Set 2 binders in advance of binder assembly
10/25/2022	Shira Gelfand	SZG	3.2	\$425.00	\$1,360.00	Correspondence with CEG (.3); attention to comparator chart and review of documents (2.6); correspondence with counsel (.2); correspondence with mediator (.1).
10/25/2022	Tracee A. Manettas	TAM	0.4	\$350.00	\$140.00	Meeting with NAZ re exhibits for trial binders and research same.
10/26/2022	Amanda T. Chan	ATC	0.5	\$375.00	\$187.50	Edit legal research memo re liquidated damages per GSC instructions.
10/26/2022	Gregory S. Chiarello	GSC	1.4	\$800.00	\$1,120.00	Zoom call with client, CEG, SZG (1.0); conferences with CEG (.4)
10/26/2022	Napoleon Zapata	NAZ	0.9	\$325.00	\$292.50	Finalize, assemble, and QC Set 1 binders for attorney review and analysis.
10/26/2022	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Prepare and finalize binder index of all documents in Set 1 binder in advance of binder assembly
10/26/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re correspondence with ERA, GHK, TAM, and RRR re status updates, preparation, and QC of binder index of all documents in Set 1 binder in advance of binder assembly.
10/26/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Correspondence with ERA, GHK, TAM, and RRR re status updates, preparation, and QC of binder index of all documents in Set 1 binder in advance of binder assembly.
10/26/2022	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Correspondence with TAM, RRR, VXY, CEG, SZG, and GSC re status updates for pending and completed trial preparation projects (181045-000001).
10/26/2022	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Meeting with RRR re check in, status updates, and workflow for pending and completed trial preparation projects (181045-000001).
10/26/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with TAM re status update for comparator spreadsheet chart project (181045-000001)
10/26/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Meetings with TAM re workflow for updates and QC of comparator chart with comparator salary, bonus, and equity grant information (181045-000001).
10/26/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Review and compile notes re meetings with TAM re workflow for updates and QC of comparator chart with comparator salary, bonus, and equity grant information (181045-000001).
10/26/2022	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Finalize and QC comparator chart with comparator salary, bonus, and equity grant information (181045-000001)
10/26/2022	Sylvie Rohrbaugh	SXR	0.1	\$325.00	\$32.50	Meet with TAM re discovery project.
10/26/2022	Shira Gelfand	SZG	1.8	\$425.00	\$765.00	Correspondence with CEG (.2); attention to data collection for comparators (.6); meeting with GSC, call with client (1).
10/26/2022	Tracee A. Manettas	TAM	0.5	\$350.00	\$175.00	Pull comparator documents from Nuix for chart of comparators
10/26/2022	Tracee A. Manettas	TAM	0.6	\$350.00	\$210.00	Meetings with SXR and NAP re comparator chart information pull.
10/26/2022	Tracee A. Manettas	TAM	0.2	\$350.00	\$70.00	Correspondence with SXR re information to pull for comparator chart
10/27/2022	Amanda T. Chan	ATC	3.6	\$375.00	\$1,350.00	Legal research re jury instructions (2.3) and legal research re when a comparator leaves the company (1.3)
10/27/2022	Cara E. Greene	CEG	3.8	\$950.00	\$3,610.00	Review and edit mediation statement draft (2.6); review comparator damages data (1.2).
10/27/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Conference with TAM re workflow for creating and updating Filevine Docket Section with pleadings in advance of upcoming trial.
10/27/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Review and compile notes re conference with TAM re workflow for creating and updating Filevine Docket Section with pleadings in advance of upcoming trial.
10/27/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with TAM re workflow for organizing and saving pleadings in the Ydrive and Filevine (181045-001)

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Case No. 19-cv-08655 (JHR)
Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
10/27/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Correspondence with GSC, CEG, and SZG re secure token for downloading courtesy copies of sealed pleadings and saving to Ydrive and Filevine.
10/27/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Begin creating Filevine Docket section and attaching pleadings.
10/27/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Conference with SXR re introduction and workflow for updating Docket Section of Filevine database
10/27/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with SXR re introduction and workflow for updating Docket Section of Filevine database
10/27/2022	Napoleon Zapata	NAZ	1.3	\$325.00	\$422.50	Pull and utilize pleadings filed under seal in Ydrive for attorney review and analysis
10/27/2022	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Begin organizing and preparing Docket section of Filevine database.
10/27/2022	Tracee A. Manettas	TAM	0.4	\$350.00	\$140.00	Meeting with NAP re trial docket.
10/27/2022	Tracee A. Manettas	TAM	0.2	\$350.00	\$70.00	Correspondence with NAP re docket update and motion to seal.
10/28/2022	Amanda T. Chan	ATC	4.6	\$375.00	\$1,725.00	Legal research re when comparator leaves company (1.0); Pulling jury charges for NYCHRL and NYEPA cases and writing memo re the same (3.6).
10/28/2022	Cara E. Greene	CEG	3.3	\$950.00	\$3,135.00	Coordinate with expert re materials and report (.4); telephone call with GSC re sealing filing and mediation statement outline (.2); continue working on mediation statement and damages analysis (2.7).
10/28/2022	Gregory S. Chiarello	GSC	2.3	\$800.00	\$1,840.00	Telephone call with CEG re mediation statement, sealing motion (.2); telephone calls and correspondence with SZG re mediation statement, expert discovery (.5); review sealing motion and correspondence re same (.6); review mediation statement and correspondence re same (.5); conferences with ATC re jury instruction research (.3); review jury instruction research (.2).
10/28/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Prepare tasks in Filevine detailing workflow and responsibility breakup of projects to complete as part of trial prep in advance of upcoming tasks (181045-000001).
10/28/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Pull and utilize newly filed pleadings Ydrive and Filevine for attorney review and analysis
10/28/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare non disclosure agreement for signature by matter expert via Vinesign.
10/28/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare documents for sending to matter expert for review and analysis via Biscom FTP.
10/28/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with TAM, SKO, and SXR re preparing documents for sending to matter expert for review, analysis, and signature via Biscom FTP and Vinesign (181045-001).
10/28/2022	Shira Gelfand	SZG	10.4	\$425.00	\$4,420.00	Draft mediation statement (7.9); call with GSC re sealing and mediation statement (.2); correspondence re sealing (.8); prepare documents for expert (1.5).
10/29/2022	Cara E. Greene	CEG	0.7	\$950.00	\$665.00	Update comparator comp charts and complete damages analysis for mediation.
10/29/2022	Napoleon Zapata	NAZ	2.3	\$325.00	\$747.50	Begin preparing binder containing Ulku Rowe deposition transcripts and exhibits for plaintiff review and analysis
10/29/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with SZG, VXY, SXR, TAM, and RRX re preparing binder containing Ulku Rowe deposition transcripts and exhibits for plaintiff review and analysis.
10/29/2022	Shira Gelfand	SZG	3.4	\$425.00	\$1,445.00	Edit mediation statement.
10/30/2022	Cara E. Greene	CEG	5.8	\$950.00	\$5,510.00	Update comparator comp chart and complete damages analysis for mediation (2.7); edit mediation statement and correspondence with SZG re same (3.1).
10/30/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with TAM, RRX, VXY, and SXR re logistics for preparing binder containing Ulku Rowe deposition transcripts and exhibits for plaintiff review and analysis.
10/30/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Continue preparing binder containing Ulku Rowe deposition transcripts and exhibits for plaintiff review and analysis.
10/30/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Continue updating Filevine Docket section to link and contain all filed pleadings
10/30/2022	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Begin preparing initial draft of deposition log.
10/30/2022	Shira Gelfand	SZG	2.4	\$425.00	\$1,020.00	Correspondence with team and counsel (2.2); attention to drafting mediation statement (2.2)
10/31/2022	Amanda T. Chan	ATC	4.5	\$375.00	\$1,687.50	Continued legal research re how to calculate damages when comparator has left company.
10/31/2022	Cara E. Greene	CEG	1.7	\$950.00	\$1,615.00	Review, edit, and finalize mediation statement.
10/31/2022	Gregory S. Chiarello	GSC	0.9	\$800.00	\$720.00	Edit mediation statement (.6); review comparator research (.1); correspondence with LitOps re sealing motion (.1); conference with SZG (.1).
10/31/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with DL, TAM, RRX, VXY, and SXR re printing, assembly, and mailing instructions for binder containing Ulku Rowe deposition transcripts and exhibits for plaintiff review and analysis.
10/31/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with SZG, TAM, VXY, and SXR re signed verification for notice of appearance sent to Nora Ostrofe for signature via Vinesign.
10/31/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Correspondence with Transperfect, TAM, RRX, VXY, and SXR re printing, assembly, and mailing instructions for binder containing Ulku Rowe deposition transcripts and exhibits for plaintiff review and analysis.
10/31/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with RRX re status updates, and upcoming trial prep projects (181045-001)
10/31/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with SZG, RRX, TAM, VXY, and SXR re shipping method, and shipping address for binder containing Ulku Rowe deposition transcripts and exhibits for plaintiff review and analysis.
10/31/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with RRX, and VXY re status updates, workflow, and upcoming trial prep projects (181045-001)
10/31/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare tasks in Filevine detailing workflow and responsibility breakup of projects to complete as part of trial prep in advance of upcoming tasks (181045-000001).
10/31/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Conference with RRX re status updates, trial prep workflow, and upcoming trial prep projects (181045-001)
10/31/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re conference with RRX re status updates, trial prep workflow, and upcoming trial prep projects (181045-001).
10/31/2022	Shira Gelfand	SZG	4.3	\$425.00	\$1,827.50	Edit and supplement mediation statement (3.2); correspondence with team and counsel (.3); attention to mediation binders (.2); review motion to seal (.6).
10/31/2022	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Correspondence with NAZ re case project updates and assignments.
10/31/2022	Vincent Yang	VXY	2.2	\$325.00	\$715.00	Review Defendant's renewed sealing motion and exhibits re consistency with sealing order.
11/01/2022	Cara E. Greene	CEG	4.7	\$950.00	\$4,465.00	Review production of updated comparator data (.4); meet and confer with opposing counsel and prepare for same (.5); conference with GSC re damages and mediation prep (.5); work on damages calculations (.7); conference with GSC, client SZG re mediation prep (2.0); telephone call with mediator (.2); review settlement agreement (.3); review materials for mediation (1.1).
11/01/2022	Gregory S. Chiarello	GSC	4.0	\$800.00	\$3,200.00	Meet and confer with opposing counsel re comparators, mediation (.5); conference with CEG re damages and mediation prep (.5); telephone calls, conferences with SZG (.4); meeting with client, CEG, SZG re mediation prep (2.0); conferences with CEG re mediation (.3); conferences with CEG, SZG re mediation (.3).
11/01/2022	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Corresponding with GSC re: sealing motions.
11/01/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with TAM and RRX re workflow for upcoming trial prep projects (181045-001)
11/01/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with TAM, SXR, and RRX re workflow and types of targeted pleadings to add to the Filevine Docket section.
11/01/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Review and compile notes re workflow and types of targeted pleadings to add to the Filevine Docket section
11/01/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Update Filevine Case Summary Section in advance of upcoming trial.
11/01/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Conference with TAM re workflow for obtaining missing deposition exhibits not received from plaintiff (181045-000001).
11/01/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Conference with VXY re updated workflow for obtaining missing deposition exhibits not received from plaintiff (181045-000001).
11/01/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Conference with SKO re obtaining missing deposition exhibits not received from plaintiff (181045-000001)
11/01/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with SZG, VXY, SXR, and TAM re exhibits missing from binder containing Ulku Rowe transcripts and exhibits.
11/01/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Correspondence with TAM, VXY, SXR, and Veritext regarding the purchasing and sending of deposition exhibits not received.

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Case No. 19-cv-08655 (JHR)
Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
11/01/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with VXY re binder structure, assembly, and delivery for mediation binder for attorney review and analysis.
11/01/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re correspondence with VXY re binder structure, assembly, and delivery for mediation binder for attorney review and analysis.
11/01/2022	Napoleon Zapata	NAZ	1.8	\$325.00	\$585.00	Continue preparing updated draft of deposition log.
11/01/2022	Shira Gelfand	SZG	5.7	\$425.00	\$2,422.50	Meet and confer call with counsel (.5); call with GSC and CEG (.3); mediation prep with client (2); draft proposed settlement agreement (2.3); correspondence with client re deposition transcripts delivery (.2); correspondence with paralegals re mediation prep (.2); correspondence with expert (.2).
11/01/2022	Tracee A. Manettas	TAM	0.3	\$350.00	\$105.00	Meeting with NAZ re deposition exhibits.
11/01/2022	Vincent Yang	VXY	2.1	\$325.00	\$682.50	Pull documents in advance of mediation.
11/01/2022	Vincent Yang	VXY	1.2	\$325.00	\$390.00	Prepare mediation binder for CEG in advance of mediation
11/01/2022	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Correspondence with SZG and office services re binder preparation
11/02/2022	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence re mediation logistics.
11/02/2022	Napoleon Zapata	NAZ	1.3	\$325.00	\$422.50	Finalize, assemble, and QC mediation binder for attorney review and analysis.
11/02/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Conference with EEPG Team re weekly team meeting and check in of paid retainer invoices
11/02/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with TAM, RRX, VXY, SZG, and CEG re confirmation of completion and drop off of mediation binder
11/02/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with TAM, VXY, SXR, and Veritext regarding the receipt from Veritext of deposition exhibits retained by opposing counsel that were initially not received.
11/02/2022	Napoleon Zapata	NAZ	1.6	\$325.00	\$520.00	Continue preparing updated draft of deposition log (181045-000001)
11/02/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with GHK re upcoming pretrial dates and deadlines (181045-000001)
11/02/2022	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Prepare update of EEPG trackers.
11/02/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Conference with PXM re upcoming trial prep projects, project workflow, and delegating (181045-001)
11/03/2022	Cara E. Greene	CEG	4.1	\$950.00	\$3,895.00	Prepare for mediation and conduct multiple damages analysis.
11/03/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Review and compile notes re conference with PXM re tracking upcoming trial prep projects, project workflow, and delegating trial prep tasks in advance of meeting with TAM (181045-001).
11/03/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare workflow re creating initial draft of tracker of targeted pleadings to add to the Filevine Docket section
11/03/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with SXR re workflow for preparing initial draft of tracker of targeted pleadings to add to the Filevine Docket section.
11/03/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Call with Veritext re deposition transcript video files, and pricing for Transcript PTX files
11/03/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting with VXY and DXS re receipt of official transcripts in advance of upcoming trial
11/03/2022	Napoleon Zapata	NAZ	1.4	\$325.00	\$455.00	Prepare updated draft of deposition log in advance of upcoming trial
11/03/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Meeting with TAM re tracking upcoming trial prep projects, project workflow, and delegating trial prep tasks
11/03/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Prepare for upcoming meeting with TAM re tracking upcoming trial prep projects, project workflow, and delegating trial prep tasks.
11/03/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re meeting with TAM re tracking upcoming trial prep projects, project workflow, and delegating trial prep tasks.
11/03/2022	Tracee A. Manettas	TAM	0.5	\$350.00	\$175.00	Meeting with NAZ re trial prep.
11/04/2022	Cara E. Greene	CEG	10.0	\$950.00	\$9,500.00	Prepare for and attend mediation.
11/04/2022	Gregory S. Chiarello	GSC	8.9	\$800.00	\$7,120.00	Attend mediation.
11/04/2022	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Corresponding with GCS re: assistance with sealing motion.
11/04/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Conference with SXR, re workflow for preparing index tracker of targeted pleadings to add to the Filevine Docket section.
11/04/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with SXR, re workflow for preparing index tracker of targeted pleadings to add to the Filevine Docket section.
11/04/2022	Sylvie Rohrbaugh	SXR	0.4	\$325.00	\$130.00	Conference with NAZ, re workflow for preparing index tracker of targeted pleadings to add to the Filevine Docket section.
11/04/2022	Shira Gelfand	SZG	10.0	\$425.00	\$4,250.00	Prep for and attend mediation.
11/07/2022	Cara E. Greene	CEG	4.9	\$950.00	\$4,655.00	Prepare for team trial planning meeting (.6); team trial planning meeting (1.8); review documents and prior briefs in preparation identifying trial exhibits (2.0); telephone call with N. Ostrofe re expert report (.5);
11/07/2022	Gregory S. Chiarello	GSC	3.8	\$800.00	\$3,040.00	Team trial planning meeting (1.8); review documents with CEG to identify trial exhibits (2.0)
11/07/2022	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Conference with GSC, VXY, SXR, CEG, and SZG re status updates, upcoming trial prep deadlines, and project workflow.
11/07/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with SXR, and VXY re trial prep projects, and upcoming meetings
11/07/2022	Napoleon Zapata	NAZ	1.2	\$325.00	\$390.00	Conference with VXY re debrief of meeting with GSC, SXR, CEG, and SZG, and workflow for Set 3 binders
11/07/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Review and compile notes re conference with VXY re debrief of meeting with GSC, SXR, CEG, and SZG, and workflow for Set 3 binders.
11/07/2022	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Conference with RRX, SXR, TAM, and VXY re status updates, deadlines, trial playbook, and upcoming trial prep projects.
11/07/2022	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Review and compile notes re conference with RRX, SXR, TAM, and VXY re status updates, deadlines, trial playbook, and upcoming trial prep projects.
11/07/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with CEG, SZG, GSC, XXY, and SXR re setup of binder containing Ulku Rowe deposition digests and transcripts, and deposition transcript video files.
11/07/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with CEG, SZG, GSC, XXY, and SXR re file contents of binder containing Ulku Rowe deposition digests and transcripts.
11/07/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Prepare binder containing Ulku Rowe deposition digests and transcripts.
11/07/2022	Napoleon Zapata	NAZ	3.4	\$325.00	\$1,105.00	Begin preparing Set 3 binders containing all documents cited in plaintiff's 56.1 pleadings, deposition and motion exhibits, and general policy documents.
11/07/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with HJ, RRX, SXR, TAM, and VXY re possible upcoming assistance needed for binder assembly
11/07/2022	Sylvie Rohrbaugh	SXR	0.7	\$325.00	\$227.50	Team conference.
11/07/2022	Sylvie Rohrbaugh	SXR	0.9	\$325.00	\$292.50	LitOps team huddle.
11/07/2022	Sylvie Rohrbaugh	SXR	0.1	\$325.00	\$32.50	Organize logistics for team meeting per email.
11/07/2022	Shira Gelfand	SZG	6.8	\$425.00	\$2,890.00	Team meetings (1.8); begin drafting jury verdict form (2.1); Begin drafting motion in limine re Yolande Piazza (2.3); calls with expert (.6);
11/07/2022	Tracee A. Manettas	TAM	0.2	\$350.00	\$70.00	Meet with SXR re Rowe staffing.
11/07/2022	Tracee A. Manettas	TAM	1.0	\$350.00	\$350.00	Meeting with team re preparation for trial.
11/07/2022	Vincent Yang	VXY	0.7	\$325.00	\$227.50	Telephone conference with CEG, GC, SZG, NAZ, and SXR re trial agenda and timeline
11/07/2022	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Telephone conference with NAZ re debrief on trial agenda
11/07/2022	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Correspondence with SZG and CEG re binder projects.
11/07/2022	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Update trial playbook and forward to RXR in advance of meeting
11/07/2022	Vincent Yang	VXY	0.9	\$325.00	\$292.50	Telephone conference with RXR, TAM, NAZ, and SXR re trial agenda
11/08/2022	Cara E. Greene	CEG	1.6	\$950.00	\$1,520.00	Research admissibility of witness compensation and related rules of evidence (1.1); draft letter to opposing counsel re supplemental discovery and pre-trial schedule (.3); correspondence with SZG, GSC re same (.2).
11/08/2022	Gregory S. Chiarello	GSC	0.5	\$800.00	\$400.00	Team correspondence re MILs (.3); conferences with SZG re MILs, trial prep (.2)
11/08/2022	Hector Jacome	HJ	0.5	\$150.00	\$75.00	Prepared binders as per N. Zapata's instructions and delivered to Jay conference room
11/08/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Finalize preparation of binder containing Ulku Rowe deposition digests and transcripts

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
11/08/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with HJ, RRX, SXR, TAM, and VXY re assembly and drop off of binder containing Ulku Rowe depositor digests and transcripts (181045-001).
11/08/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with SXR, TAM, and VXY re workflow for preparing Set 3 binders for attorney review and analysis
11/08/2022	Napoleon Zapata	NAZ	3.9	\$325.00	\$1,267.50	Continue preparation, finalize, and QC of Set 3 binders containing all documents cited in plaintiff's 56.1 pleadings, deposition and motion exhibits, and general policy documents.
11/08/2022	Napoleon Zapata	NAZ	1.1	\$325.00	\$357.50	Conference with VXY re workflow for preparing Set 3 binders and binder index for attorney review and analysis
11/08/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re conference with VXY re workflow for preparing Set 3 binders for attorney review and analysis.
11/08/2022	Napoleon Zapata	NAZ	1.1	\$325.00	\$357.50	Correspondence with Transperfect Legal Solutions, TAM, RRX, VXY, SXR, and HJ re printing, assembly, and delivery instructions for Set 3 binders for attorney review and analysis.
11/08/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with TAM, RRX, VXY, and SXR re PTO calendar and scheduling availability for trial and trial prep shifts.
11/08/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Review and compile notes re conference with GSC, VXY, SXR, CEG, and SZG re status updates, upcoming trial prep deadlines, and project workflow.
11/08/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Conference with VXY re workflow for finalizing and QC of documents included within Set 3 binders
11/08/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re conference with VXY re workflow for finalizing and QC of documents included within Set 3 binders.
11/08/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with VXY re binder index updates and assembly of Set 3 binders
11/08/2022	Sylvie Rohrbaugh	SXR	0.1	\$325.00	\$32.50	Correspond with CEG re conference schedule.
11/08/2022	Sylvie Rohrbaugh	SXR	0.4	\$325.00	\$130.00	Update availability for shifts re: trial preparation.
11/08/2022	Sylvie Rohrbaugh	SXR	0.5	\$325.00	\$162.50	Update trial preparation agenda items re meetings notes and attorney correspondence.
11/08/2022	Sylvie Rohrbaugh	SXR	1.1	\$325.00	\$357.50	Work on targeted pleadings index.
11/08/2022	Shira Gelfand	SZG	8.9	\$425.00	\$3,782.50	Correspondence with team (.2); trial prep tasks including drafting motions in limine; doc review of policy documents for paralegals (8.7).
11/08/2022	Vincent Yang	VXY	8.8	\$325.00	\$2,860.00	Compile, organize, dedupe production documents for exhibits review binders; create index re same; correspondence with NAZ re same.
11/09/2022	Cara E. Greene	CEG	3.8	\$950.00	\$3,610.00	Conference with GSC to review hot docs to prepare trial exhibit list.
11/09/2022	Cara E. Greene	CEG	1.0	\$950.00	\$950.00	Telephone call with SZG re MILs and trial plan (.3); team meeting re same (.3); correspondence with expert re report (.4).
11/09/2022	Gregory S. Chiarello	GSC	3.8	\$800.00	\$3,040.00	Conference with CEG to review hot docs to prepare trial exhibit list.
11/09/2022	Hector Jacome	HJ	0.5	\$150.00	\$75.00	Received early AM delivery from Transperfect and assisted to ensemble the documents into binders.
11/09/2022	Jennifer LaMarch	JLM	0.2	\$350.00	\$70.00	File letter re expert discovery schedule.
11/09/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with SXR re upcoming meetings, project status, and upcoming trial prep projects (181045-001)
11/09/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with GSC, and CEG re setup and assembly of binder containing all Ulku Rowe deposition exhibits
11/09/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with GSC, CEG, RRX, and TAM re setup and assembly of binder containing all Ulku Rowe deposition exhibits.
11/09/2022	Napoleon Zapata	NAZ	1.7	\$325.00	\$552.50	Finalize, assemble, and QC Set 3 binders for attorney review and analysis.
11/09/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with Transperfect Legal Solutions, TAM, RRX, VXY, SXR, and HJ re printing, assembly, and delivery instructions for Set 3 binders for attorney review and analysis.
11/09/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Continue to review and compile notes re conference with GSC, VXY, SXR, CEG, and SZG re status updates, upcoming trial prep deadlines, and project workflow.
11/09/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meetings with CEG, and GSC re updated workflow for assembling trial prep binders, Set 3 Binder questions
11/09/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Review and compile notes re meeting with CEG, and GSC re updated workflow for assembling trial prep binders
11/09/2022	Napoleon Zapata	NAZ	1.1	\$325.00	\$357.50	Prepare binder containing all Ulku Rowe deposition exhibits for attorney review and analysis
11/09/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Conference with SXR re project status, preparing weekly lists of agenda topics for LitOps Weekly Huddles, and scheduling demos of Trial Pad and VLC.
11/09/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with SXR, RRX, TAM, and VXY re preparing weekly lists of agenda topics for LitOps Weekly Huddles, and using O&G Rowe Paralegals Listserv.
11/09/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Meeting with GSC and CEG re preparing binder containing all Ulku Rowe deposition exhibits for attorney review and analysis.
11/09/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with with GSC, TAM, and RRX re preparing binder containing all Ulku Rowe deposition exhibits for attorney review and analysis.
11/09/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Conference with VXY re updated workflow for assembling trial prep binders, and clarification re Set 3 Binder questions.
11/09/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re conference with VXY re updated workflow for assembling trial prep binders, and clarification re Set 3 Binder questions.
11/09/2022	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Conference with RRX re project status updates, upcoming deadlines, scheduling of PTO and early/afternoon shifts on trial calendar, and updates to trial playbook.
11/09/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with SXR, RRX, TAM, and VXY re updated workflow for ordering documents for all upcoming trial prep binders.
11/09/2022	Shira Gelfand	SZG	7.9	\$425.00	\$3,357.50	Continue drafting motions in limine and conduct research re same (5.9); call with paralegals on updates and to do list (.2); call with CEG re MILs and trial plan (.3); draft letter to court (1.2); correspondence with o/c re same and file letter (.3).
11/09/2022	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Telephone conference with NAZ re binder structure for potential trial exhibit documents
11/09/2022	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Telephone conference with SZG, NAZ, and SXR re weekly updates.
11/10/2022	Gregory S. Chiarello	GSC	0.4	\$800.00	\$320.00	Edit MILs (.2); conferences with SZG re same (.2).
11/10/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Review and compile notes re conference with RRX re project status updates, upcoming deadlines, scheduling of PTO and early/afternoon shifts on trial calendar, and updates to trial playbook.
11/10/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare initial draft of LitOps Weekly Tracker for tracking agenda items, notes, and action items per weekly meeting
11/10/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with RRX, SXR, TAM, and VXY re updating LitOps Weekly Tracker for tracking agenda items, notes, and action items per weekly meeting.
11/10/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Prepare Filevine tasks for trial prep projects and upcoming deadlines
11/10/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with RRX, SXR, TAM, and VXY re updating Para Availability Calendar with PTO and shift availability
11/10/2022	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Prepare updated draft of Para Availability Calendar with PTO and shift availability (181045-001)
11/10/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with SZG, VXY, and TAM re accessing Paul Hastings secure file transfer portal to download supplementary defendant production.
11/10/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Access, download, and prepare supplementary defendant production for uploading into Nuix database
11/10/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with GHK, ERA, VXY, TAM, NCX,, and SXR re uploading supplementary production into Nuix database.
11/10/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with RRX, TAM, VXY, SXR, and US Legal re request and delivery of sealed and stamped official transcripts
11/10/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with RRX, TAM, VXY, SXR, and Veritext Legal Solutions re request and delivery of sealed and stamped official transcripts.
11/10/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Conference with Veritext Legal Solutions re request and delivery of sealed and stamped official transcripts (181045-001).

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
11/10/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with VXY re project status updates, upcoming trial prep projects, and delivery of sealed and stamped official transcripts.
11/10/2022	Shira Gelfand	SZG	6.4	\$425.00	\$2,720.00	Continue drafting Motions in Limine (4.9); research for Schofield jury charge samples (.4); Call with team (.3); call with CEG (.2); attention to production (.4); correspondence with expert (.2).
11/11/2022	Cara E. Greene	CEG	7.1	\$950.00	\$6,745.00	Telephone call with SZG re motion in limine (.2); meeting with SZG, GSC to discuss motions in limine (.3); research and draft Piazza MIL (6); call with SZG re NYCHRL legal standards (.3); tcw GSC re case staffing and strategy (.3).
11/11/2022	Gregory S. Chiarello	GSC	0.8	\$800.00	\$640.00	Team call re MILs (.3); edit draft MILs (.5).
11/11/2022	Napoleon Zapata	NAZ	2.0	\$325.00	\$650.00	Prepare initial draft of trial playbook tracking status of trial prep projects, deadlines, team members responsible for projects, and contact information in advance of upcoming trial.
11/11/2022	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Prepare initial draft of trial playbook tracking status of trial prep projects, deadlines, team members responsible for projects, and contact information in advance of upcoming trial.
11/11/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with RRX, TAM, SXR, and VXY re updates to trial playbook, and additional proposed edits
11/11/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with SZG, TAM, VXY, and SXR re obtaining hard copies of sealed and stamped deposition transcripts (181045-001).
11/11/2022	Sylvie Rohrbaugh	SXR	0.4	\$325.00	\$130.00	Update litigations operations action list and agenda.
11/11/2022	Sylvie Rohrbaugh	SXR	0.2	\$325.00	\$65.00	Correspondence with team re action list and agenda for trial preparation
11/11/2022	Sylvie Rohrbaugh	SXR	0.1	\$325.00	\$32.50	Amend Lit Ops meeting agenda per NAZ email.
11/11/2022	Shira Gelfand	SZG	3.8	\$425.00	\$1,615.00	Continue drafting motions in limine and research re same (3.6); correspondence with team (.2)
11/12/2022	Cara E. Greene	CEG	2.1	\$950.00	\$1,995.00	Finish drafting Piazza MIL.
11/12/2022	Shira Gelfand	SZG	2.1	\$425.00	\$892.50	Review Mauet Trial techniques.
11/13/2022	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence with SZG re MILs.
11/14/2022	Amanda T. Chan	ATC	0.8	\$375.00	\$300.00	Legal research in support of drafting jury charge.
11/14/2022	Cara E. Greene	CEG	7.2	\$950.00	\$6,840.00	Telephone call with expert and prepare for same (1.0); meeting with GSC to review documents in preparation for drafting exhibit index (5.7); team meeting with SZG, GSC re motions in limine (.5).
11/14/2022	Gregory S. Chiarello	GSC	7.4	\$800.00	\$5,920.00	Meeting with CEG to review documents for exhibit list (5.7); team meeting with SZG, CEG re MILs (.5); review jury charge samples and correspondence with ATC re same (.5); NYCHRL standards research (.2); review Def MSI papers and begin Rowe witness outline (.5).
11/14/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Research and review Southern District of New York website for updated calendar of trial proceedings for Judge Lorna G. Schofield.
11/14/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with SZG, VXY, SXR, and TAM re research and review of Southern District of New York website for updated calendar of trial proceedings for Judge Lorna G. Schofield.
11/14/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with US Legal re available video files for deposition transcripts
11/14/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with Veritext re available video files for deposition transcripts
11/14/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review 171653-001 Filevine database for trial exhibit list to use as template in advance of preparing exhibit list for this matter.
11/14/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review deposition transcripts to determine if we received video files in advance of contacting court reporters
11/14/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Conference with RRX re project deadlines, status updates, and workflow for upcoming projects (181045-000001)
11/14/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and compile notes re conference with RRX re project deadlines, status updates, and workflow for upcoming projects (181045-000001).
11/14/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with VXY, TAM, RRX, and SXR re location of trial exhibit list in 171653-001 filevine database to use as a template in advance of preparing exhibit list for this matter (181045-001).
11/14/2022	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Prepare updated draft of trial playbook tracking status of trial prep projects, deadlines, team members responsible for projects, and contact information in advance of upcoming trial.
11/14/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Conference with RRX, TAM, SXR, and VXY re Litops Weekly Huddle for Rowe/Google Trial Prep
11/14/2022	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Conference with VXY re binder index and assembly for Rowe Set 2 binders, status updates, and upcoming deadlines
11/14/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re conference with RRX, TAM, SXR, and VXY re Litops Weekly Huddle for Rowe/Google Trial Prep.
11/14/2022	Sylvie Rohrbaugh	SXR	0.3	\$325.00	\$97.50	Update index.
11/14/2022	Sylvie Rohrbaugh	SXR	0.2	\$325.00	\$65.00	Update agenda for litops conference.
11/14/2022	Sylvie Rohrbaugh	SXR	0.1	\$325.00	\$32.50	Correspondence with VXY re agenda items.
11/14/2022	Sylvie Rohrbaugh	SXR	0.2	\$325.00	\$65.00	Correspondence with NAZ re agenda items.
11/14/2022	Sylvie Rohrbaugh	SXR	0.6	\$325.00	\$195.00	Telephone conference with RRX, TAM, NAZ, and VXY re trial agenda items
11/14/2022	Sylvie Rohrbaugh	SXR	0.3	\$325.00	\$97.50	Update action list and notes re items discussed in team conference.
11/14/2022	Shira Gelfand	SZG	7.3	\$425.00	\$3,102.50	Draft motions in limine (4.1); call with team re motions in limine (.5); call with expert (1); review of Defendant's supplemental production (1.7).
11/14/2022	Tracee A. Manettas	TAM	0.5	\$350.00	\$175.00	Meeting with team re trial preparation.
11/14/2022	Vincent Yang	VXY	0.7	\$325.00	\$227.50	Telephone conference with NAZ re outstanding trial agenda items.
11/14/2022	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Correspondence with CEG re trial exhibits binder review.
11/14/2022	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Review Nuix productions re metadata for potential trial exhibits.
11/14/2022	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Calendar expert discovery deadlines.
11/14/2022	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspondence with SXR re agenda items.
11/14/2022	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Setup and review trialpad software.
11/14/2022	Vincent Yang	VXY	0.6	\$325.00	\$195.00	Telephone conference with RRX, TAM, NAZ, and SXR re trial agenda items
11/15/2022	Amanda T. Chan	ATC	7.3	\$375.00	\$2,737.50	Draft jury charge for NYCHRL and NYEPL claims and legal research in support of the same
11/15/2022	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Correspondence with SZG re FSVL candidate MIL (.2); conference with SZG re MILs (.2).
11/15/2022	Gregory S. Chiarello	GSC	0.7	\$800.00	\$560.00	Conference with ATC re jury charge.
11/15/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with VXY re hard copies of sealed and stamped official deposition transcripts
11/15/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with RRX, TAM, VXY, SXR, and Veritext Legal Solutions re request and delivery of sealed and stamped official transcripts.
11/15/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Meeting with HJ and VXY re binders in Jay conference room (181045-001)
11/15/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with HJ and RRX re binder and printing supplies for upcoming trial prep print and binder requests (181045-001).
11/15/2022	Napoleon Zapata	NAZ	2.6	\$325.00	\$845.00	Visit Southern District of New York courthouse with RRX, TAM, SXR, and VXY in advance of upcoming trial
11/15/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Meeting with VXY re deposition transcript video files supported by VLC Player in advance of preparing deposition video clips for possible use as trial demonstratives.
11/15/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with Veritext re available video files for deposition transcripts
11/15/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with RRX re deposition transcript video files supported by VLC Player, and available video deposition transcript files in advance of preparing deposition video clips for possible use as trial demonstratives.
11/15/2022	Sylvie Rohrbaugh	SXR	0.4	\$325.00	\$130.00	Update agenda items for litigations operations.
11/15/2022	Shira Gelfand	SZG	6.2	\$425.00	\$2,635.00	Draft motions in limine (5); Review Mauet Trials book in Preparation for Trials (1.2)
11/15/2022	Tracee A. Manettas	TAM	2.5	\$350.00	\$875.00	Trip to SDNY for Rowe trial preparation.
11/15/2022	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspondence with records department re storing sealed transcripts.
11/15/2022	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Conference with NAZ re transcripts and exhibit list.
11/15/2022	Vincent Yang	VXY	2.5	\$325.00	\$812.50	Trip to SDNY.
11/15/2022	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Correspondence with IT re TrialPad and VLC programs; troubleshoot programs
11/16/2022	Amanda T. Chan	ATC	5.8	\$375.00	\$2,175.00	Continued legal research in support of drafting jury charge.

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
11/16/2022	Cara E. Greene	CEG	5.8	\$950.00	\$5,510.00	Review documents in preparation for drafting exhibit list (4.6); litigation team meeting to discuss MILs, JPTO, and jury charge (.9); review expert report and call with SZG re same (.3).
11/16/2022	Gregory S. Chiarello	GSC	6.0	\$800.00	\$4,800.00	Review documents to draft exhibit list (4.6); litigation team meeting to discuss MILs, JPTO, and jury charge (.9); review expert report with CEG (.2); review Def MSI papers and draft list of potential defenses (.3).
11/16/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Prepare deposition video files for review and analysis in advance of preparing video clips for use as possible trial demonstratives.
11/16/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with VXY re deposition transcript invoices, and deposition transcript video files in advance of upcoming trial prep call with attorneys (181045-001).
11/16/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Conference with CEG, GSC, SZG, VXY, and SXR re upcoming trial prep projects, upcoming deadlines, status updates, and trial technology.
11/16/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with SXR, VXY, RRX, and TAM re completing and circulating availability calendar in advance of upcoming trial.
11/16/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare Filevine tasks for trial prep projects and upcoming deadlines (181045-001)
11/16/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Review and compile notes re conference with CEG, GSC, SZG, VXY, and SXR re upcoming trial prep projects, upcoming deadlines, status updates, and trial technology.
11/16/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Review and compile notes re conference with CEG, GSC, SZG, VXY, and SXR re upcoming trial prep projects, upcoming deadlines, status updates, and trial technology. (181045-001).
11/16/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Conference with RRX re trial demonstrative software, trial hotseat software, file formats for synced deposition transcripts, and workflow for deposition designations and creating trial video demonstratives (181045-001).
11/16/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and compile notes re conference with RRX re trial demonstrative software, trial hotseat software, file formats for synced deposition transcripts, and workflow for deposition designations and creating trial video demonstratives (181045-001).
11/16/2022	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Prepare updated draft of trial playbook tracking status of trial prep projects, deadlines, team members responsible for projects, and contact information in advance of upcoming trial.
11/16/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Prepare updated draft of trial playbook tracking status of trial prep projects, deadlines, team members responsible for projects, and contact information in advance of upcoming trial (181045-001).
11/16/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Conference with VXY re upcoming deadlines and trial prep projects
11/16/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Review and compile notes re conference with VXY re upcoming deadlines and trial prep projects
11/16/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Prepare deposition video files for review and analysis in advance of preparing video clips for use as possible trial demonstratives (181045-001).
11/16/2022	Sylvie Rohrbaugh	SXR	1.1	\$325.00	\$357.50	Telephone conference with CEG, GSC, SZG, NAZ, and VXY re trial agenda timelines
11/16/2022	Sylvie Rohrbaugh	SXR	0.6	\$325.00	\$195.00	Update notes and litigation operations agenda per team conference today.
11/16/2022	Shira Gelfand	SZG	5.8	\$425.00	\$2,465.00	Draft motions in limine (3.1); team meeting re MILs, JPTO, and jury charge (.9); call with CEG re expert report (.3); review expert report and assumptions (1.3); draft agenda items for meet and confer (.2).
11/16/2022	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Correspondence with IT re troubleshooting TrialPad licensing.
11/16/2022	Vincent Yang	VXY	1.1	\$325.00	\$357.50	Telephone conference with CEG, GSC, SZG, NAZ, and SXR re trial agenda timelines
11/16/2022	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Conference with NAZ re deadlines for trial.
11/17/2022	Amanda T. Chan	ATC	5.0	\$375.00	\$1,875.00	Legal research in support of drafting damages section of jury charge; drafting the same.
11/17/2022	Cara E. Greene	CEG	3.3	\$950.00	\$3,135.00	Meet and confer with opposing counsel re MILs and pre-trial schedule (.5); correspondence with SZG, GSC re MILs, jury charge and comparator evidence (.3); conference with SZG re MILs (.1); prepare for conference with expert re report (.3); telephone call with expert re report (.7); conference with SZG re same (.1); review correspondence with opposing counsel re scheduling (.1); correspondence with litigation operations team re preparation of exhibit list (.2); conference with Lit Ops re pre-trial tasks, preparation of exhibit and witness lists, upcoming filings (1.0).
11/17/2022	Gregory S. Chiarello	GSC	0.9	\$800.00	\$720.00	M&C confer with defendant, CEG, SZG re MILs (.5); correspondence with ATC re jury charge (.2); team correspondence (.2).
11/17/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with CEG, TAM, ARM, and KBX re deposition video invoices (181045-001)
11/17/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Review notes and deposition invoices in advance of upcoming meeting with TAM.
11/17/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Review and compile additional trial prep deadlines in advance of preparing updated draft of trial playbook (181045-001).
11/17/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with TAM re deposition invoices for videos of depositions (181045-001)
11/17/2022	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Meeting with CEG, SXR, VXY, and RRX re trial exhibits, complete documents, spreadsheet formatting, physical binders of trial exhibits, and upcoming deadlines.
11/17/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with VXY re updates to trial playbook, and workflow for compiling trial exhibits
11/17/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Meeting with RRX re updates to trial playbook, and workflow for compiling trial exhibits
11/17/2022	Napoleon Zapata	NAZ	0.9	\$325.00	\$292.50	Prepare updated draft of trial playbook tracking status of trial prep projects, deadlines, team members responsible for projects, and contact information in advance of upcoming trial (181045-001).
11/17/2022	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Prepare updated draft of trial playbook tracking status of trial prep projects, deadlines, team members responsible for projects, and contact information in advance of upcoming trial.
11/17/2022	Napoleon Zapata	NAZ	1.1	\$325.00	\$357.50	Meeting with DJ, RRX, SXR, VXY, and TAM re TrialPad demo in advance of upcoming trial (181045-001)
11/17/2022	Sylvie Rohrbaugh	SXR	1.0	\$325.00	\$325.00	Conference with CEG, VXY, NAZ, and RRX re exhibit list projects and trial dates
11/17/2022	Shira Gelfand	SZG	4.3	\$425.00	\$1,827.50	Prep for and attend meet and confer call with Google re pretrial schedule (.5); continue drafting motions in limine (3.4); call with expert (.2); correspondence with team re front pay (.2).
11/17/2022	Vincent Yang	VXY	1.2	\$325.00	\$390.00	Review expert report sources and exhibits.
11/17/2022	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Conference with CEG, RXR, NAZ, and SXR re trial exhibit list, binders, pretrial filings, etc
11/18/2022	Amanda T. Chan	ATC	4.8	\$375.00	\$1,800.00	Continued legal research on damages in support of drafting jury charge.
11/18/2022	Cara E. Greene	CEG	1.4	\$950.00	\$1,330.00	Review and finalize expert report (1.2); correspondence re MILs (.2).
11/18/2022	Gregory S. Chiarello	GSC	1.2	\$800.00	\$960.00	Edit MILs, correspondence with team re same (1.0); conference with SZG re producing docs used in expert report (.2).
11/18/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Begin to review and compile notes re meeting with CEG, SXR, VXY, and RRX re trial exhibits, complete documents, spreadsheet formatting, physical binders of trial exhibits, and upcoming deadlines.
11/18/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with CEG, SZG, GSC, SXR, VXY, and RRX re contents of Set 1, 2, and 3 binders that were reviewed to create initial draft of plaintiff trial exhibit list.
11/18/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Begin preparing additional set of binders containing deposition digests and transcripts in advance of sending to Transperfect Legal Solutions for printing.
11/18/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Organize and prepare additional supplementary defendant production for uploading to Nuix database for attorney review and analysis.
11/18/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Continue to review and compile notes re meeting with CEG, SXR, VXY, and RRX re trial exhibits, complete documents, spreadsheet formatting, physical binders of trial exhibits, and upcoming deadlines.
11/18/2022	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Continue to review and compile notes re meeting with CEG, SXR, VXY, and RRX re trial exhibits, complete documents, spreadsheet formatting, physical binders of trial exhibits, and upcoming deadlines (181045-001).
11/18/2022	Napoleon Zapata	NAZ	0.9	\$325.00	\$292.50	Prepare notes re format and assembly specifications of plaintiff trial exhibit list, physical plaintiff trial exhibit binders, and upcoming trial prep deadlines in advance of circulating to RRX, SXR, VXY, and TAM.
11/18/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with RRX, SXR, VXY, and TAM re updates to notes re format and assembly specifications of plaintiff trial exhibit list, physical plaintiff trial exhibit binders, and upcoming trial prep deadlines in advance of updating trial playbook.

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
11/18/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Conference with VXY, and SXR re QC of Document Date metadata field of documents in Nuix in advance of preparing updated draft of plaintiff trial exhibit list.
11/18/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Correspondence with VXY, and SXR re updated workflow for performing QC of Document Date metadata field of documents in Nuix in advance of preparing updated draft of plaintiff trial exhibit list.
11/18/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with Nuix Administrators re preparing and uploading additional supplementary production to Nuix database for attorney review and analysis (181045-001).
11/18/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review docket and trial playbook to identify court filing deadlines for upcoming week to coordinate support in advance of Thanksgiving 2022 holiday.
11/18/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with VXY, RRX, SXR, TAM, and JLM re filing deadlines for upcoming week to coordinate support in advance of Thanksgiving 2022 holiday (181045-001).
11/18/2022	Napoleon Zapata	NAZ	2.8	\$325.00	\$910.00	QC Document Date metadata field of documents in Nuix in advance of preparing updated draft of plaintiff trial exhibit list.
11/18/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and compile notes re conference with VXY, and SXR re QC of Document Date metadata field of documents in Nuix in advance of preparing updated draft of plaintiff trial exhibit list.
11/18/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Begin drafting email to Transperfect Legal Solutions re print request and assembly instructions for deposition digests and transcripts for attorney review and analysis.
11/18/2022	Sylvie Rohrbaugh	SXR	0.5	\$325.00	\$162.50	Conference with VXY, and NAZ re QC of Document Date metadata field of documents in Nuix in advance of preparing updated draft of plaintiff trial exhibit list.
11/18/2022	Shira Gelfand	SZG	6.6	\$425.00	\$2,805.00	Draft and edit motions in limine (4.3); review and edit expert report (.6); attention to document prep for exhibit list (1.4); correspondence with counsel (.1); correspondence with expert (.2).
11/18/2022	Shira Gelfand	SZG	0.4	\$425.00	\$170.00	Initial review of production from Google.
11/18/2022	Vincent Yang	VXY	1.2	\$325.00	\$390.00	Review expert report documents cited.
11/18/2022	Vincent Yang	VXY	2.1	\$325.00	\$682.50	Assemble index re potential exhibits designated by CEG.
11/18/2022	Vincent Yang	VXY	4.7	\$325.00	\$1,527.50	Assemble electronic binder re potential exhibits; format native files; consolidate sources with attachments; update index.
11/18/2022	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Add manual bates stamps to client tax return documents; correspondence with SZG re same.
11/19/2022	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Conference with GSC re MILs and weekend staffing plan (.3); review and edit trial task list (.1).
11/19/2022	Gregory S. Chiarello	GSC	3.9	\$800.00	\$3,120.00	Review deadlines and draft deadline table (.5); conference with CEG re trial preparation (1.0); correspondence with SZG (.1); edit motions in limine (2.3).
11/19/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Conference with SXR re updated workflow for QC of Document Date metadata field of documents in Nuix in advance of preparing updated draft of plaintiff trial exhibit list.
11/19/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Follow up conference with SXR re questions for QC of Document Date metadata field of documents in Nuix in advance of preparing updated draft of plaintiff trial exhibit list.
11/19/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with SXR re questions for QC of Document Date metadata field of documents in Nuix in advance of preparing updated draft of plaintiff trial exhibit list.
11/19/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	QC Document Date metadata field of documents in Nuix in advance of preparing updated draft of plaintiff trial exhibit list.
11/19/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with VXY, and SXR re final review of documents to QC Document Date metadata field for in Nuix in advance of preparing updated draft of plaintiff trial exhibit list.
11/19/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review notes of updated workflow for QC of Document Date metadata field of documents in Nuix in advance of upcoming conference with SXR re QC workflow, project instructions, and deadlines (181045-001).
11/19/2022	Sylvie Rohrbaugh	SXR	3.5	\$325.00	\$1,137.50	Organize potential exhibits through Nuix and exhibit index.
11/19/2022	Shira Gelfand	SZG	6.8	\$425.00	\$2,890.00	Research and memo re trial depositions and remote testimony (3.8); review production and correspond with paralegals re exhibit binders (3).
11/20/2022	Cara E. Greene	CEG	3.1	\$950.00	\$2,945.00	Correspondence with SZG re requesting supplementation from opposing counsel (.2); review research memo from SZG re witness trial depositions and correspondence re same (.4); review and edit L8 MIL (.8); review and edit FSVL candidate MIL (.6); review and edit MIL FSVL feedback MIL (.5); review supplemental productions from November 6 and November 17 (.6).
11/20/2022	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Review RFPs and correspond with team re supplemental production.
11/20/2022	Shira Gelfand	SZG	5.4	\$425.00	\$2,295.00	Edit and supplement motion in limine and research re same (4); correspondence with CEG (.2); document review (1.2).
11/21/2022	Amanda T. Chan	ATC	1.1	\$375.00	\$412.50	Continue to draft damages section of jury charge.
11/21/2022	Cara E. Greene	CEG	5.3	\$950.00	\$5,035.00	Review, edit, and finalize five motions in limine and notices of motions; review related documents and deposition transcripts; research case law related to hearsay exceptions and evidentiary standards; conferences with SZG, GSC re same; quick review of Google's motions in limine.
11/21/2022	Gregory S. Chiarello	GSC	6.3	\$800.00	\$5,040.00	Edit, finalize and file motions in limine (4.7); review de ben esse research memo (.2); correspondence with ATC (.1); team meetings (.6); Rowe examination outline (.7).
11/21/2022	Jennifer LaMarch	JLM	0.5	\$350.00	\$175.00	File motions in limine.
11/21/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with SXR, VXY, RRX, and TAM re agenda topics for LitOps Weekly Huddle - Rowe/Google Trial Prep (181045-001).
11/21/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with HJ, RRX, VXY, SXR, and TAM re assembly for binder containing all deposition digests and transcripts.
11/21/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Continue preparing additional set of binders containing deposition digests and transcripts in advance of sending to Transperfect Legal Solutions for printing.
11/21/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with HJ, RRX, TAM, SXR, VXY, and Transperfect Legal Solutions re print request and assembly instructions for deposition digests and transcripts for attorney review and analysis.
11/21/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Meeting with RRX re workflow for using Bulk Rename tool to rename files for initial draft of trial exhibit list (181045-001).
11/21/2022	Napoleon Zapata	NAZ	3.2	\$325.00	\$1,040.00	Review ending bates ranges of trial exhibit documents in advance of finalizing updated draft of trial exhibit list and ordering exhibits by chron date.
11/21/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Compile and QC ending bates ranges of trial exhibit documents in advance of finalizing updated draft of trial exhibit list and ordering exhibits by chron date.
11/21/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with VXY, and SXR re workflow for manually ordering trial exhibits by Chron Date (181045-001).
11/21/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Correspondence with SXR re workflow for reviewing ending bates ranges of trial exhibit documents in advance of finalizing updated draft of trial exhibit list and ordering exhibits by chron date (181045-001).
11/21/2022	Sylvie Rohrbaugh	SXR	0.2	\$325.00	\$65.00	Correspondence with VXY and NAZ re potential exhibit list.
11/21/2022	Sylvie Rohrbaugh	SXR	0.1	\$325.00	\$32.50	Correspondence with RRX, VXY, and NAZ re meeting and action items.
11/21/2022	Sylvie Rohrbaugh	SXR	2.2	\$325.00	\$715.00	Update potential exhibits index.
11/21/2022	Shira Gelfand	SZG	10.3	\$425.00	\$4,377.50	Edit, finalize motion in limines and prepare for filing (10); call court clerk (.2); correspondence with counsel (.1).
11/21/2022	Vincent Yang	VXY	6.1	\$325.00	\$1,982.50	Prepare comparator documents and other potential exhibits for CEG review; organize index re same.
11/21/2022	Vincent Yang	VXY	0.9	\$325.00	\$292.50	Format motions in limine briefs and research local rules re procedures; correspondence with SZG re same.
11/21/2022	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Prepare notices of motion re motions in limine and format briefs further.
11/21/2022	Vincent Yang	VXY	0.5	\$325.00	\$162.50	File notice of appearance.
11/21/2022	Vincent Yang	VXY	2.4	\$325.00	\$780.00	Finalize and format briefs and motions in limine.
11/22/2022	Amanda T. Chan	ATC	5.4	\$375.00	\$2,025.00	Research Schofield jury charges and compare/contrast to the proposed Rowe jury charge and insert Schofield jury charges into Rowe jury charge (5.4).

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
11/22/2022	Amanda T. Chan	ATC	0.9	\$375.00	\$337.50	Legal research re discussion of substantially similar and bona fide factor under NYLL 194
11/22/2022	Cara E. Greene	CEG	0.6	\$950.00	\$570.00	Finish reviewing Google's MILs (.6); conference with SZG, GSC re response to same (.5); correspondence with lit ops re trial tasks (.1).
11/22/2022	Gregory S. Chiarello	GSC	2.7	\$800.00	\$2,160.00	Review defendant's MILs (.3); team meeting re MIL Opps (.5); draft jury charge (1.9).
11/22/2022	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Reviewing new filings re: Google's sealing motion and evidentiary motions.
11/22/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with CEG, GSC, SZG, VXY, TAM SXR, and RRX re additional copy of binders containing deposition digest and transcripts.
11/22/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Assemble and QC binders containing all deposition digests and transcripts.
11/22/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Assemble and QC binders containing all deposition digests and transcripts (181045-000001)
11/22/2022	Napoleon Zapata	NAZ	1.7	\$325.00	\$552.50	Rename trial exhibits to sort by chron date in advance of attorney review and analysis
11/22/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with SXR and VXY re workflow and breakup of work for renaming trial exhibits to sort by chron date in advance of attorney review and analysis (181045-001).
11/22/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with SXR and VXY re workflow and breakup of work for renaming trial exhibits to sort by chron date in advance of attorney review and analysis.
11/22/2022	Sylvie Rohrbaugh	SXR	0.3	\$325.00	\$97.50	Teleconference with RRX re weekly meeting action items and notes.
11/22/2022	Sylvie Rohrbaugh	SXR	0.5	\$325.00	\$162.50	Update potential exhibit list.
11/22/2022	Sylvie Rohrbaugh	SXR	0.3	\$325.00	\$97.50	Coordinate weekly meeting with team.
11/22/2022	Sylvie Rohrbaugh	SXR	0.9	\$325.00	\$292.50	Revise and edit litigation operations team notes and agenda.
11/22/2022	Sylvie Rohrbaugh	SXR	1.4	\$325.00	\$455.00	Organize potential exhibit list.
11/22/2022	Sylvie Rohrbaugh	SXR	0.6	\$325.00	\$195.00	Rename files in chronological order for potential exhibit list
11/22/2022	Shira Gelfand	SZG	8.7	\$425.00	\$3,697.50	Review Google's motions in limine and outline opposition (2); team meeting with CEG and GSC re response to same (.5); begin drafting motions in limine oppositions (4.4); correspondence with counsel (.1); attention to sealing motion and re-filing exhibits (1.7).
11/22/2022	Vincent Yang	VXY	0.4	\$325.00	\$130.00	Format index re trial exhibits and organize documents.
11/22/2022	Vincent Yang	VXY	0.4	\$325.00	\$130.00	Save and organize motion in limine filings in case file.
11/22/2022	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Review meeting notes to update trial playbook.
11/22/2022	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Finalize trial exhibits spreadsheet for CEG review.
11/23/2022	Amanda T. Chan	ATC	6.6	\$375.00	\$2,475.00	Finalize jury charge and submit to GSC per his edits (3.0); legal research on bona fide factor and business necessity for equal pay claim (3.6).
11/23/2022	Cara E. Greene	CEG	1.3	\$950.00	\$1,235.00	Correspondence with opposing counsel re exit agreements and review same (.3); review redactions for re-filing of sealed documents and correspondence re same (.6); conferences with SXG re same (.4).
11/23/2022	Gregory S. Chiarello	GSC	4.0	\$800.00	\$3,200.00	Case management meeting (.5); draft jury charge (3.5).
11/23/2022	Jennifer LaMarch	JLM	1.0	\$350.00	\$350.00	File unsealed and new redactions to summary judgment motion.
11/23/2022	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Conference with RRX, and SXR re project status, upcoming deadlines, and upcoming trial prep projects
11/23/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Review and compile notes re conference with RRX and SXR re project status, upcoming deadlines, and upcoming trial prep projects.
11/23/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updates to circulated notes re meeting with CEG, SXR, VXY, and RRX re trial exhibits, complete documents, spreadsheet formatting, physical binders of trial exhibits, and upcoming deadlines (181045-001).
11/23/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with HJ, RRX, SXR, TAM, and VXY re supplies for upcoming trial
11/23/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with RRX, VXY, TAM, and SXR re updated trial playbook (181045-001)
11/23/2022	Napoleon Zapata	NAZ	1.8	\$325.00	\$585.00	Prepare updated draft of trial playbook with supply list, and trial prep deadlines in chronological order
11/23/2022	Napoleon Zapata	NAZ	1.5	\$325.00	\$487.50	Prepare updated draft of trial playbook with supply list, and trial prep deadlines in chronological order (181045-001).
11/23/2022	Napoleon Zapata	NAZ	1.1	\$325.00	\$357.50	Correspondence with SXR, VXY, SXO, PXM, and SZG re documents to file, and necessary redactions to make in advance of filing documents (181045-001).
11/23/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Conference with PXM, and SXR re necessary redactions to make in advance of filing documents (181045-001)
11/23/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Conference with SXO re necessary redactions to make in advance of filing documents (181045-001)
11/23/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review emails in advance of conference with SXO re necessary redactions to make in advance of filing documents (181045-001).
11/23/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re conference with SXO re necessary redactions to make in advance of filing documents (181045-001).
11/23/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and compile notes re conference with PXM, and SXR re necessary redactions to make in advance of filing documents (181045-001).
11/23/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Call with RRX re status updates, upcoming deadlines, and meeting agenda items for upcoming trial prep conference (181045-001).
11/23/2022	Sara Olson	SXO	0.2	\$350.00	\$70.00	Correspondence with SZG re re-file of documents to MSJ Briefing; prepare unsealed documents and redact documents.
11/23/2022	Sara Olson	SXO	0.1	\$350.00	\$35.00	Telephone conference with SZG re re-file of documents to MSJ Briefing; prepare unsealed documents and redact documents.
11/23/2022	Sara Olson	SXO	0.1	\$350.00	\$35.00	Telephone conference with NAZ re re-file of documents to MSJ Briefing; prepare unsealed documents and redact documents.
11/23/2022	Sara Olson	SXO	0.1	\$350.00	\$35.00	Telephone conference with VXY, PXM, SXR re re-file of documents to MSJ Briefing; prepare unsealed documents and redact documents.
11/23/2022	Sara Olson	SXO	0.5	\$350.00	\$175.00	Correspondence with VXY re re-file of documents to MSJ Briefing; prepare unsealed documents and redact documents.
11/23/2022	Sara Olson	SXO	2.9	\$350.00	\$1,015.00	Redact documents for limited redaction refile.
11/23/2022	Sara Olson	SXO	0.2	\$350.00	\$70.00	Compile unsealed documents for re-filing.
11/23/2022	Sara Olson	SXO	0.2	\$350.00	\$70.00	Add slipsheets to exhibits.
11/23/2022	Sara Olson	SXO	0.3	\$350.00	\$105.00	PDF-A files.
11/23/2022	Sylvie Rohrbaugh	SXR	2.1	\$325.00	\$682.50	Update targeted pleadings index.
11/23/2022	Sylvie Rohrbaugh	SXR	0.8	\$325.00	\$260.00	Conference with RRX, and NAZ re project status, upcoming deadlines, and upcoming trial prep projects
11/23/2022	Shira Gelfand	SZG	10.2	\$425.00	\$4,335.00	Attention to re-filing redacted exhibits (.8); meetings with paralegals and review of documents (.1); meeting with CEG and GSC re same (.4); continue drafting opposition to motion in limine (5.6); draft letter response to Defendant's letter motion and research re same (3.3); correspondence with counsel.
11/23/2022	Vincent Yang	VXY	5.5	\$325.00	\$1,787.50	Apply redactions to summary judgment exhibits and briefs per Defendant's renewed motion to seal.
11/23/2022	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Telephone conference with RXR re trial agenda.
11/25/2022	Gregory S. Chiarello	GSC	1.3	\$800.00	\$1,040.00	Draft jury charge.
11/26/2022	Shira Gelfand	SZG	5.6	\$425.00	\$2,380.00	Draft letter opposition and motion in limine oppositions
11/27/2022	Cara E. Greene	CEG	4.1	\$950.00	\$3,895.00	Review exhibit index and revise (1.5); review and edit de bene esse letter (.5); review and edit jury charges and related research (2.1).
11/27/2022	Gregory S. Chiarello	GSC	1.5	\$800.00	\$1,200.00	Draft jury charge.
11/27/2022	Shira Gelfand	SZG	6.2	\$425.00	\$2,635.00	Edit and supplement opposition letter re de bene esse depositions and continue drafting motion in limine oppositions.
11/28/2022	Cara E. Greene	CEG	1.0	\$950.00	\$950.00	Litigation team meeting re pre-trial tasks and prepare for same (.5); correspondence re exhibits, postponement of trial, JPTO (.5).
11/28/2022	Gregory S. Chiarello	GSC	1.7	\$800.00	\$1,360.00	Draft jury instructions (.7); conference with CEG re jury instructions (.5); team meeting (.5)

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
11/28/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Prepare updated draft of trial playbook with updates to trial prep deadlines in chronological order (181045-001)
11/28/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with SXR, RRX, TAM, and VXY re calendaring upcoming trial prep deadlines on docket
11/28/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with SXR, RRX, TAM, and VXY re weekly agenda items for upcoming LitOps Weekly Huddle Rowe/Google Trial Prep conference.
11/28/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with RRX, and TAM re video file types of Ulku Rowe depositions to purchase from veritext in advance of creating video demonstratives and making deposition designations for upcoming trial.
11/28/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with TAM re voided deposition invoices for videos of depositions (181045-001), and next steps
11/28/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with CEG, KBX, TAM, and ARM re voided deposition invoices for videos of depositions (181045-001), and next steps.
11/28/2022	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Conference with RRX, TAM, SXR, and VXY re Litops Weekly Huddle for Rowe/Google Trial Prep
11/28/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and compile notes re conference with CEG, GSC, SZG, VXY, and SXR re finalizing trial exhibit list, finalizing binders of trial exhibits, and upcoming trial prep deadlines.
11/28/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Conference with CEG, GSC, SZG, VXY, and SXR re finalizing trial exhibit list, finalizing binders of trial exhibits, and upcoming trial prep deadlines (181045-001).
11/28/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with VXY, SXR, RRX, and TAM re workflow for updating trial exhibit list to identify sources of documents and where they were used (181045-001).
11/28/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with RRX re updates to trial playbook (181045-001)
11/28/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Review documents within initial draft of trial exhibit list to determine workflow for identify document sources, and determine which documents were initially printed as native slipsheets (181045-001).
11/28/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and compile notes re conference with CEG, GSC, SZG, VXY, and SXR re finalizing trial exhibit list, finalizing binders of trial exhibits, and upcoming trial prep deadlines (181045-001).
11/28/2022	Sylvie Rohrbaugh	SXR	1.1	\$325.00	\$357.50	Update docket index.
11/28/2022	Sylvie Rohrbaugh	SXR	0.2	\$325.00	\$65.00	Calendar deadline re Docket 161 Response to Google's Letter Motion.
11/28/2022	Sylvie Rohrbaugh	SXR	0.4	\$325.00	\$130.00	Update docket section tracker.
11/28/2022	Sylvie Rohrbaugh	SXR	0.1	\$325.00	\$32.50	Update docket index.
11/28/2022	Sylvie Rohrbaugh	SXR	0.7	\$325.00	\$227.50	Conference with VXY, TAM, RRX, and NAZ re litigation operations weekly huddle
11/28/2022	Sylvie Rohrbaugh	SXR	0.5	\$325.00	\$162.50	Team conference.
11/28/2022	Sylvie Rohrbaugh	SXR	0.3	\$325.00	\$97.50	Update weekly agenda for litigation operations team.
11/28/2022	Shira Gelfand	SZG	8.4	\$425.00	\$3,570.00	Prepare task list for team meeting; team meeting; correspondence with CEG and GSC; review of exhibits; draft motion in limine opposition and research re same; call with S. Tomesko and court clerk.
11/28/2022	Tracee A. Manettas	TAM	0.7	\$350.00	\$245.00	Meeting with team re trial preparation.
11/28/2022	Vincent Yang	VXY	3.8	\$325.00	\$1,235.00	Review exhibits list and add source column and denote native documents needing review.
11/28/2022	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Telephone conference with CEG, SZG, GSC, NAZ, and SXR re trial exhibit list and filings
11/28/2022	Vincent Yang	VXY	0.7	\$325.00	\$227.50	Telephone conference with RRX, TAM, NAZ, and SXR re weekly trial updates
11/29/2022	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Review and edit letter to the court re de bene esse depositions (.3); correspondence re same (.2)
11/29/2022	Gregory S. Chiarello	GSC	3.7	\$800.00	\$2,960.00	Revisions to jury instructions, legal research re same.
11/29/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting with HJ re supply list for upcoming trial.
11/29/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with HJ re initial supply list for upcoming trial
11/29/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with CEG, KBX, TAM, and ARM re voided deposition invoices for videos of depositions and next steps.
11/29/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with RRX, TAM, VXY, SXR, and Veritext regarding the purchasing and turnaround time of receiving synced MPEG4 video files of Ulku Rowe depositions.
11/29/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Meeting with VXY re workflow for preparing physical binders of trial exhibit list
11/29/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Prepare updated draft of trial exhibit list.
11/29/2022	Napoleon Zapata	NAZ	4.8	\$325.00	\$1,560.00	Pull documents, prepare and QC binders for CEG and GSC containing trial exhibits for attorney review and analysis
11/29/2022	Napoleon Zapata	NAZ	2.6	\$325.00	\$845.00	Pull documents and prepare additional binder set containing trial exhibits for attorney review and analysis
11/29/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Review and compile notes re conference with RRX, TAM, SXR, and VXY re Litops Weekly Huddle for Rowe/Google Trial Prep.
11/29/2022	Sylvie Rohrbaugh	SXR	1.1	\$325.00	\$357.50	Import documents from docket to case file.
11/29/2022	Sylvie Rohrbaugh	SXR	0.3	\$325.00	\$97.50	Update meeting notes in tracker for matter.
11/29/2022	Sylvie Rohrbaugh	SXR	1.1	\$325.00	\$357.50	Update potential exhibit list.
11/29/2022	Sylvie Rohrbaugh	SXR	9.5	\$325.00	\$3,087.50	Compile trial exhibits binders for CEG and GSC review.
11/29/2022	Shira Gelfand	SZG	6.7	\$425.00	\$2,847.50	Draft motion in limine opposition (2.7); conduct research for jury charge (2.4); meeting with GSC (.3); continue drafting and editing letter motion opposition re de bene esse depositions. (1.3).
11/29/2022	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Correspondence with CEG re trial exhibits binder.
11/30/2022	Amanda T. Chan	ATC	2.6	\$375.00	\$975.00	Legal research re voir dire in Schofield trials.
11/30/2022	Cara E. Greene	CEG	11.8	\$950.00	\$11,210.00	Review and edit de bene esse letter for filing (.4); meeting to review documents for inclusion in exhibit binder, set trial strategy, and prepare proposed voir dire (7.0); review and edit jury charge, verdict form (4.4).
11/30/2022	Gregory S. Chiarello	GSC	11.2	\$800.00	\$8,960.00	Meeting with CEG, SZG to QC exhibits and exhibit list (5.4); team meeting (.2); draft voir dire (1.5); meeting with CEG, SZG re voir dire revisions (2.1); edit verdict form (.7); legal research for jury instructions (1.3).
11/30/2022	Jennifer LaMarch	JLM	0.6	\$350.00	\$210.00	Review opposition and motion to seal; file opposition to motion for de bene esse depositions redacted and under seal; file motion to seal.
11/30/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with JLM, SZG, RRX, TAM, VXY, and SXR re assistance needed for upcoming filing
11/30/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with SZG, RRX, TAM, VXY, and SXR re video files for depositions
11/30/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Conference with CEG, GSC, SZG, VXY, and SXR re project status, upcoming trial prep projects, and upcoming deadlines.
11/30/2022	Napoleon Zapata	NAZ	1.2	\$325.00	\$390.00	Rename trial exhibits to match updated chron date order in advance of preparing trial exhibit binders
11/30/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	QC additional set of binders containing trial exhibits for attorney review and analysis
11/30/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with RRX and TAM re supplies for upcoming trial
11/30/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Continue to review and compile notes re conference with RRX, TAM, SXR, and VXY re Litops Weekly Huddle for Rowe/Google Trial Prep.
11/30/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with RRX, TAM, VXY, SXR, and Veritext regarding the purchasing and turnaround time of receiving synced MPEG4 video files of Ulku Rowe depositions.
11/30/2022	Sylvie Rohrbaugh	SXR	0.5	\$325.00	\$162.50	QC binders for trial exhibits.
11/30/2022	Sylvie Rohrbaugh	SXR	0.4	\$325.00	\$130.00	Review team correspondence re filing opposition to de bene esse.
11/30/2022	Shira Gelfand	SZG	8.5	\$425.00	\$3,612.50	Meeting with team to finalize exhibit list (6.2); edit to voir dire (.5); finalize letter motion and draft sealing letter and attention to filing (2.2); correspondence with counsel (.2); review of agreements (.3).
11/30/2022	Vincent Yang	VXY	9.5	\$325.00	\$3,087.50	Compile trial exhibits binders for CEG and GSC review.
11/30/2022	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Format letterhead re letter.
11/30/2022	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Conference with CEG, GSC, SZG, NAZ and SXR re pending agenda.
11/30/2022	Vincent Yang	VXY	1.5	\$325.00	\$487.50	Draft sealing motion and finalize letter motion opposition re de bene esse depositions
11/30/2022	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Make further edits to motion to seal and correspondence with JLM re filing
12/01/2022	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence re motions in limine.
12/01/2022	Gregory S. Chiarello	GSC	2.2	\$800.00	\$1,760.00	Edit draft MIL Opp re leveling (1.3); JPTO scheduling, correspondence (.2); team meeting (.7)
12/01/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with SDC, RRX, TAM, VXY, and SXR re written discovery index

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Case No. 19-cv-08655 (JHR)
Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
12/01/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Begin reviewing Filevine database and Ydrive to identify interrogatories and requests for production in advance of drafting written discovery index.
12/01/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting with RRX re trial supply list, written discovery index, and edits to trial exhibit index and binders
12/01/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting with SDC re overview of trial prep status, upcoming trial prep projects, and deadlines in advance of upcoming trial.
12/01/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with SDC, RRX, TAM, VXY, and SXR re overview of trial prep status, upcoming trial prep projects, and deadlines in advance of upcoming trial.
12/01/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Pull and organize pleadings in Ydrive for attorney review and analysis
12/01/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with JLM, SZG, SXR, and VXY re obtaining pleadings filed under seal by O&G for organizing in Ydrive for attorney review and analysis.
12/01/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with CEG re required synced deposition videos, upcoming deposition designations, and trial prep deadlines.
12/01/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with RRX, TAM, VXY, SXR, and Veritext regarding pricing and turnaround time of receiving expedited synced MPEG4 video files of Ulku Rowe depositions.
12/01/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with RRX, TAM, VXY, SXR, and US Legal regarding pricing and turnaround time of receiving expedited synced deposition video files of Evren Eryurek, and Benjamin Wilson depositions.
12/01/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Call with US Legal regarding pricing and turnaround time of receiving expedited synced deposition video files of Evren Eryurek, and Benjamin Wilson depositions.
12/01/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Call with US Legal re required synced deposition videos, and tutorial to use DepoView software to access and view them.
12/01/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Meetings with RRX re workflow to install DepoView software onto loaner laptop to access synced deposition videos in advance of upcoming deadline of deposition designation exchange.
12/01/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with CEG, GSC, SZG, RRX, VXY, SXR, TAM, and SDC re status of synced deposition videos in advance of upcoming deadline of deposition designation exchange.
12/01/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and compile notes re workflow for obtaining synced deposition videos and demo of DepoView software in advance of upcoming deadlines for exchange of deposition designations.
12/01/2022	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Prepare updated draft of trial playbook with updates to upcoming trial prep projects, and deadlines in chronological order (181045-001).
12/01/2022	Shira Gelfand	SZG	8.5	\$425.00	\$3,612.50	Draft motion in limine opposition (3.3); begin drafting joint pre-trial order (1.2); review Google's letter reply to court and correspondence with team re same (.6); edit draft overview of witnesses and subpoena power (.2); review GSC edits to motion in limine opposition re leveling and begin incorporating edits (2.4); team meeting (.8).
12/01/2022	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Forward sample pretrial documents to SZG.
12/01/2022	Vincent Yang	VXY	0.7	\$325.00	\$227.50	Prepare spreadsheet re witness locations and separation agreements.
12/02/2022	Cara E. Greene	CEG	4.5	\$950.00	\$4,275.00	Meeting with litigation operations re trial support (1.0); review documents in preparation for exhibit list (3.0); conference with GSC re pre-trial planning (.5).
12/02/2022	Gregory S. Chiarello	GSC	4.6	\$800.00	\$3,680.00	Exhibit review (2.1); conference with CEG re trial planning (.8); edit MIL Opp re other complaints (1.7)
12/02/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with RRX re status update for obtaining synced deposition videos and demo of DepoView software in advance of upcoming deadlines for exchange of deposition designations.
12/02/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Meetings with RRX re status updates for obtaining Evren Eryurek and Benjamin Wilson synced deposition videos, and DepoView software features in advance of demo with CEG, GSC, and SZG.
12/02/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with Veritext re pricing for obtaining synced Ulku Rowe deposition videos
12/02/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with US Legal re availability of Evren Eryurek and Benjamin Wilson synced deposition videos, and pricing
12/02/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re call with US Legal re availability of Evren Eryurek and Benjamin Wilson synced deposition videos, and pricing.
12/02/2022	Napoleon Zapata	NAZ	0.9	\$325.00	\$292.50	Draft guide for using DepoView for attorney review in advance of upcoming deadline for exchanging deposition designations.
12/02/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with CEG, GSC, SZG, RRX, TAM, SXR, and VXY re DepoView guide and demo
12/02/2022	Napoleon Zapata	NAZ	1.3	\$325.00	\$422.50	Research DepoView manuals and tutorials to determine functionality and feature set in advance of drafting DepoView guide for attorney review.
12/02/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Review and compile notes re meetings with RRX re status updates for obtaining Evren Eryurek and Benjamin Wilson synced deposition videos, and DepoView software features in advance of demo with CEG, GSC, and SZG.
12/02/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with CEG re upcoming demo for DepoView, and functionality.
12/02/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re meeting with CEG re upcoming demo for DepoView with CEG, and functionality
12/02/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with VXY re DepoView functionality and upcoming demo for DepoView
12/02/2022	Napoleon Zapata	NAZ	3.0	\$325.00	\$975.00	Prepare updated draft of trial playbook with updates to upcoming trial prep projects, and deadlines in chronological order (181045-001).
12/02/2022	Shira Gelfand	SZG	4.4	\$425.00	\$1,870.00	Correspondence with team (.2); Edit and continue drafting motion in limine opp and research re same (3.7); review documents re internal complaints (.4); correspondence with counsel (.1).
12/03/2022	Cara E. Greene	CEG	7.0	\$950.00	\$6,650.00	Review Shaukat, Burdis, Vardaman, Stevens transcripts and designate deposition transcripts for trial (4.7); review defendant's proposed jury charge, voir dire, and verdict form (1.1); conference with GSC re defendant's proposed jury charge, voir dire, and verdict form (1.2).
12/03/2022	Gregory S. Chiarello	GSC	4.6	\$800.00	\$3,680.00	Review Google markup to Jury Charge, Voir Dire and Verdict Form (.5); telephone call with CEG re same (1.2); edit MIL Opp re complaints (1.1); edit MIL Opp re leveling (1.8).
12/03/2022	Shira Gelfand	SZG	6.2	\$425.00	\$2,635.00	Draft and edit motions in limine; conduct research re same (3.3); begin drafting proposed stipulated facts and review of RFAs and answer (2.9).
12/04/2022	Cara E. Greene	CEG	1.5	\$950.00	\$1,425.00	Review Grannis deposition transcript (1.3); correspondence re trial adjournment, jury call with opposing counsel (.2).
12/04/2022	Gregory S. Chiarello	GSC	3.9	\$800.00	\$3,120.00	Edit Jury charge, legal research re same (2.4); edit MIL Opp re leveling and legal research re same (.9); edit MIL Opp re complaints (.6).
12/04/2022	Shira Gelfand	SZG	5.4	\$425.00	\$2,295.00	Continue drafting motions in limine and stipulations of fact; correspondence with team
12/05/2022	Cara E. Greene	CEG	5.8	\$950.00	\$5,510.00	Review opposition briefs to motions in limine and edit; review combined jury charge, voir dire, and verdict form and edit; conferences and correspondence re same; research backpay and compensatory case law for jury charge; continue drafting JPTO; review evidence related to leveling decisions; correspondence re courtesy copies and review court rules.
12/05/2022	Gregory S. Chiarello	GSC	7.2	\$800.00	\$5,760.00	Meet & Confer with Google counsel, SZG (.7); preparation for same (.3); conferences with CEG (.4); conference with SZG (.2); edit and finalize joint jury charge, voir dire and verdict form (3.4); team meeting with Lit Ops (.8); edit MIL Opps (1.4)
12/05/2022	Jennifer LaMarch	JLM	0.6	\$350.00	\$210.00	File proposed voir dire, jury charge, verdict forms and opposition to motions in limine
12/05/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with SZG re upcoming check in conference.
12/05/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with RRX, TAM, SDC, VXY, and SXR re updates to trial playbook and additional edits in advance of circulating to attorneys.
12/05/2022	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Meeting with CEG, SZG, GSX, VXY, SXR, and SDC re upcoming trial prep projects for this coming week, deadlines, and updates re trial date for upcoming trial.
12/05/2022	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Meetings with SDC re updates to trial playbook, upcoming trial prep projects, and upcoming deadlines for this week

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
12/05/2022	Sylvie Rohrbaugh	SXR	0.8	\$325.00	\$260.00	Telephone conference with CEG, GSC, SZG, NAZ, SDC, and VXY re weekly meeting re trial agenda and pre-trial filings timeline.
12/05/2022	Sylvie Rohrbaugh	SXR	0.4	\$325.00	\$130.00	Update agenda and notes per litigations operations weekly meeting.
12/05/2022	Shira Gelfand	SZG	11.9	\$425.00	\$5,057.50	Call with GSC and Prep for Meet and confer (.6); meet and confer with Google (.8); debrief call with GSC (.1); Finalize motions in limine oppositions with cite checks and proofs (2.2); Prep agenda for team meeting (.2); Team meeting (.8); draft stipulations of fact and review RFAs, Answer, Interrogatory, and documents (3.4); Attention to filing of jury charge, voir dire, verdict form, oppositions to motions in limine; review court rules re same; email to court with courtesy copies; correspondence with team (3.8).
12/05/2022	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspondence with SDC re trial tasks.
12/05/2022	Vincent Yang	VXY	0.8	\$325.00	\$260.00	Telephone conference with CEG, GSC, SZG, NAZ, SDC, and SXR re weekly meeting re trial agenda and pre-trial filings timeline.
12/05/2022	Vincent Yang	VXY	1.3	\$325.00	\$422.50	Edit voir dire form in advance of filing.
12/05/2022	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Forward initial disclosures for SZG review.
12/05/2022	Vincent Yang	VXY	3.6	\$325.00	\$1,170.00	Format voir dire and jury instructions and motions in limine oppositions; finalize re same
12/06/2022	Cara E. Greene	CEG	6.6	\$950.00	\$6,270.00	Continue drafting JPTO; review and edit stipulation of facts; finalize depo designations and review Wilson deposition; review and edit telephone script for L. Law; review Plaintiff's exhibit for inclusion in exhibit list.
12/06/2022	Gregory S. Chiarello	GSC	4.7	\$800.00	\$3,760.00	Review/edit JPTO (.8); conferences with CEG re JPTO (1.2); review Burdis, Shaikat depositions and designations (2.5); correspondence with Google counsel (.2).
12/06/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with TAM, SXR, VXY, SDC, and RRX re updates to trial playbook and paralegal availability calendar in advance of circulating to attorneys.
12/06/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated draft of paralegal availability calendar in advance of circulating to attorneys
12/06/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Follow up correspondence with US Legal re availability of Evren Eryurek and Benjamin Wilson synced deposition videos, and pricing.
12/06/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Conference with SZG re drafting list of motions in limine for attorney review in advance of filing joint pretrial order
12/06/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with SXR and SZG re drafting list of motions in limine for attorney review in advance of filing joint pretrial order.
12/06/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with CEG, SXR, SDC, and VXY re updates to trial exhibit list, and binders containing trial exhibits.
12/06/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Correspondence with CEG, SXR, SDC, and VXY re updates to trial exhibit list and binders containing trial exhibits
12/06/2022	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Review docket and draft list of motions in limine for attorney analysis in advance of filing joint pretrial order
12/06/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting with SDC re workflow for updating binders containing exhibit lists.
12/06/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated draft of trial playbook with updated trial prep projects and upcoming deadlines
12/06/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Follow up meetings with SDC and SXR regarding updates to workflow for preparing updated binders containing trial exhibits for attorney review and analysis in advance of upcoming trial exhibit exchange with opposing counsel.
12/06/2022	Napoleon Zapata	NAZ	6.8	\$325.00	\$2,210.00	Begin to organize, and prepare updated binders containing trial exhibits for attorney review and analysis in advance of upcoming trial exhibit exchange with opposing counsel.
12/06/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with VXY, re updates to trial exhibit index, and additional documents to pull to prepare updated trial exhibit binders in advance of attorney review and analysis.
12/06/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with VXY, SXR, and SDC re updates to paralegal availability calendar
12/06/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updates to paralegal availability calendar in advance of circulating to attorneys
12/06/2022	Sylvie Rohrbaugh	SXR	0.4	\$325.00	\$130.00	Conference with CEG re final exhibit list.
12/06/2022	Sylvie Rohrbaugh	SXR	10.0	\$325.00	\$3,250.00	Prepare exhibit binders.
12/06/2022	Shira Gelfand	SZG	6.9	\$425.00	\$2,932.50	Edit and supplement stipulation of facts (.7); draft script for witness call Leonard Law and attempt to call (.4); prep for and call with client (.5); Review Google's responses to Plaintiff's five motions in limine (1.8); Review Mauet trials book-opening statements and direct examinations (2.1); orientation of Sara Clinton to matter (.3); review joint pre trial order (.5); take notes and correspond with CEG re trial theme (.5); correspondence with opposing counsel (.1).
12/06/2022	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Telephone conference with CEG, NAZ, SXR, and SDC re exhibit trial binders
12/06/2022	Vincent Yang	VXY	4.5	\$325.00	\$1,462.50	Organize trial exhibits and index re same per CEG edits and notes.
12/06/2022	Vincent Yang	VXY	4.4	\$325.00	\$1,430.00	Organize, pull and format trial exhibit documents for CEG review; finalize index re same
12/07/2022	Cara E. Greene	CEG	8.1	\$950.00	\$7,695.00	Finalize exhibit list to send to opposing counsel, conference with litigation ops re same
12/07/2022	Gregory S. Chiarello	GSC	2.3	\$800.00	\$1,840.00	Exhibit QC meeting (1.4); team meeting re exhibits (.7); conference with CEG re trial (.2)
12/07/2022	Napoleon Zapata	NAZ	2.0	\$325.00	\$650.00	Prepare, finalize, and QC updated binders containing trial exhibits for attorney review and analysis in advance of upcoming trial exhibit exchange with opposing counsel.
12/07/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Correspondence with SDC, VXY, SXR, RX, and TAM re finalizing updated trial exhibit binders in advance of attorney review and analysis.
12/07/2022	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Prepare updated draft of trial playbook with updated trial prep projects and upcoming deadlines
12/07/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with RRX, SXR, TAM, VXY, SDC, GSC, CEG, and SZG re circulation of trial playbook, and calendar containing paralegal availability.
12/07/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Meeting with RRX, TAM, VXY, SDC, and SXR re LitOps Weekly Huddle re upcoming exchange of trial exhibits with opposing counsel, trial binders, deposition designations, and upcoming trial prep deadlines in advance of upcoming trial.
12/07/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with CEG, GSC, SZG, VXY, SXR, SDC, RRX, and TAM re inability to obtain Evren Eryurek and Benjamin Wilson synced deposition videos from US legal, and DepoView demo.
12/07/2022	Napoleon Zapata	NAZ	0.9	\$325.00	\$292.50	Meeting with CEG, GSC, VXY, SXR, and SDC re finalizing trial exhibit list in advance of exchange with opposing counsel, preparing cross reference of plaintiff vs. defendant trial exhibits, updates to binders containing trial exhibits to match final trial exhibit list, and witness binders.
12/07/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with VXY re bates numbers of exhibits referenced in Ulku Rowe depositions
12/07/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meeting with VXY and SXR re workflow for developing cross reference of trial exhibits that are unique to opposing counsel.
12/07/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Review and compile notes re meeting with CEG, GSC, VXY, SXR, and SDC re finalizing trial exhibit list in advance of exchange with opposing counsel, preparing cross reference of plaintiff vs. defendant trial exhibits, updates to binders containing trial exhibits to match final trial exhibit list, and witness binders.
12/07/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Prepare and update workflow for finalizing trial exhibit list in advance of exchange with opposing counsel, preparing cross reference of plaintiff vs. defendant trial exhibits, and updating binders of trial exhibits to match final trial exhibit list.
12/07/2022	Napoleon Zapata	NAZ	1.3	\$325.00	\$422.50	Prepare draft of meeting notes re meeting with CEG, GSC, VXY, SXR, and SDC re finalizing trial exhibit list in advance of exchange with opposing counsel, preparing cross reference of plaintiff vs. defendant trial exhibits, and updates to binders containing trial exhibits to match final trial exhibit list in advance of circulating to Rowe paralegals.
12/07/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Organize emails re projects, status updates and meeting scheduling in advance of upcoming trial
12/07/2022	Sylvie Rohrbaugh	SXR	0.9	\$325.00	\$292.50	Conference with CEG, GSC, VXY, NAZ re exhibit binders.
12/07/2022	Sylvie Rohrbaugh	SXR	0.5	\$325.00	\$162.50	Conference with RRX, TAM, VXY, NAZ re lit ops.
12/07/2022	Sylvie Rohrbaugh	SXR	5.6	\$325.00	\$1,820.00	Review trial exhibits in advance of exhibit exchange; review Defendant's trial exhibit list, create combined index
12/07/2022	Sylvie Rohrbaugh	SXR	0.1	\$325.00	\$32.50	Email CEG final exhibit list for exchange with defendants.
12/07/2022	Sylvie Rohrbaugh	SXR	0.2	\$325.00	\$65.00	Correspond with CEG re declaration; locate declaration.
12/07/2022	Shira Gelfand	SZG	4.9	\$425.00	\$2,082.50	Attention to exhibits and exhibit list (.2); draft motion to seal opposition (4.7)
12/07/2022	Tracee A. Manettas	TAM	0.5	\$350.00	\$175.00	Meeting with team re trial preparation.
12/07/2022	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Pull documents for CEG trial exhibit review and correspondence with CEG re same

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
12/07/2022	Vincent Yang	VXY	0.6	\$325.00	\$195.00	Telephone conference with NAZ, RXR, SXR, and TAM re trial agenda
12/07/2022	Vincent Yang	VXY	0.9	\$325.00	\$292.50	Conference with CEG, GSC, SXR, NAZ, and SDC re trial exhibit list.
12/07/2022	Vincent Yang	VXY	4.9	\$325.00	\$1,592.50	Review trial exhibits and create final trial exhibit list in advance of exhibit exchange; review Defendant's trial exhibit list.
12/08/2022	Gregory S. Chiarello	GSC	0.9	\$800.00	\$720.00	Review PI exhibits for drafting PI direct examination (.4); edit opposition to motion to seal (.5)
12/08/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare and update workflow for finalizing trial exhibit list in advance of exchange with opposing counsel, preparing cross reference of plaintiff vs. defendant trial exhibits, and updating binders of trial exhibits to match final trial exhibit list.
12/08/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Meeting with RRX, VXY, and SXR re workflow for preparing cross reference of documents unique to defendant trial exhibit list, binders containing documents unique to defendant trial exhibit list, and witness binder contents.
12/08/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Follow up meetings with VXY, and SXR re updated workflow for preparing cross reference of documents unique to defendant trial exhibit list, and binders containing documents unique to defendant trial exhibit list.
12/08/2022	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Prepare updated draft of defendant exhibit list with metadata pulled from Nuix to assist with creating cross reference of exhibits unique to defendant.
12/08/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare batch print of defendant trial exhibits for review to assist with creating cross reference of exhibits unique to defendant.
12/08/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with VXY re project status of cross reference of exhibits unique to defendant
12/08/2022	Napoleon Zapata	NAZ	1.6	\$325.00	\$520.00	Prepare, finalize, and QC binders containing trial exhibits unique to defendant for attorney review and analysis
12/08/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Update draft of meeting notes re meeting with CEG, GSC, VXY, SXR, and SDC re finalizing trial exhibit list in advance of exchange with opposing counsel, preparing cross reference of plaintiff vs. defendant trial exhibits, and updates to binders containing trial exhibits to match final trial exhibit list in advance of circulating to Rowe paralegals.
12/08/2022	Sylvie Rohrbaugh	SXR	0.4	\$325.00	\$130.00	Run Nuix report re exhibit lists.
12/08/2022	Sylvie Rohrbaugh	SXR	0.2	\$325.00	\$65.00	Conference with VXY re exhibits on Nuix.
12/08/2022	Sylvie Rohrbaugh	SXR	1.0	\$325.00	\$325.00	Conference with VXY, RRX, and NAZ re pulling and organizing Defendant's exhibit list
12/08/2022	Sylvie Rohrbaugh	SXR	2.4	\$325.00	\$780.00	Prepare draft of defendant exhibit list with Nuix metadata for cross reference of exhibits unique to defendant
12/08/2022	Sylvie Rohrbaugh	SXR	0.3	\$325.00	\$97.50	Correspond with VXY re exhibit comparison project and workflow
12/08/2022	Shira Gelfand	SZG	3.7	\$425.00	\$1,572.50	Draft opposition to motion to seal and research re same; review GSC edits and supplement edits to letter
12/08/2022	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Conference with NAZ, RXR, and SXR re pulling and organizing Defendant's exhibit list
12/08/2022	Vincent Yang	VXY	1.4	\$325.00	\$455.00	Update docket re case documents and calendar re new orders; format and consolidate Defendant exhibit lists
12/08/2022	Vincent Yang	VXY	5.7	\$325.00	\$1,852.50	Pull and organize documents indicated in Defendant's exhibit list; prepare exhibit index re same
12/09/2022	Cara E. Greene	CEG	6.1	\$950.00	\$5,795.00	Review exhibits designated by Defendant and note objections; conference with SZG, GSC re strategy; review objection to sealing brief; conferences with litigation ops team re combined exhibits list and review same.
12/09/2022	Gregory S. Chiarello	GSC	5.9	\$800.00	\$4,720.00	Edit sealing motion opposition (1.5); conference with SZG re sealing motion opposition (.4); meeting with CEG to review Def's exhibits for authenticity and objections (4.0).
12/09/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Prepare updated draft of trial playbook containing updated trial prep deadlines and contact list
12/09/2022	Napoleon Zapata	NAZ	4.3	\$325.00	\$1,397.50	Prepare and QC internal combined exhibit list containing plaintiff and defendant exhibits, and update cross reference of trial exhibits for attorney review and analysis.
12/09/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Meetings with SXR, and VXY re workflow for preparing internal combined exhibit list containing plaintiff and defendant exhibits and workflow for updating cross reference of trial exhibits.
12/09/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting with CEG, SZG, GSC, VXY, and SXR re preparing internal combined exhibit list containing plaintiff and defendant exhibits, and updates to cross reference of trial exhibits.
12/09/2022	Sylvie Rohrbaugh	SXR	6.0	\$325.00	\$1,950.00	Update trial exhibits list.
12/09/2022	Sylvie Rohrbaugh	SXR	1.0	\$325.00	\$325.00	Update trials exhibit list.
12/09/2022	Shira Gelfand	SZG	8.0	\$425.00	\$3,400.00	Edit, supplement, and finalize motion to seal opposition and conduct research re same (4.8); Rowe meeting re Def's exhibit list (3.1); correspondence with counsel (.1).
12/09/2022	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspondence with SXR re trial document re-organization.
12/09/2022	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Conference with CEG, GSC, NAZ, and SXR re consolidating Defendant's and Plaintiff's exhibit lists
12/09/2022	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Conference with CEG and GSC re additional edits to exhibits index.
12/09/2022	Vincent Yang	VXY	0.2	\$325.00	\$65.00	File opposition to Defendant's motion to seal.
12/10/2022	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Review Defendant's edits to JPTO; correspondence with GSC re Defendant's exhibit list.
12/10/2022	Vincent Yang	VXY	3.3	\$325.00	\$1,072.50	Prepare and format parties' combined exhibit list index for CEG review
12/11/2022	Cara E. Greene	CEG	5.3	\$950.00	\$5,035.00	Review Defendant's edits to JPTO, review depositions and make cross-designations, note objections for JPTO, review objections to Defendant's exhibit list, correspondence with GSC, SZG re same.
12/11/2022	Gregory S. Chiarello	GSC	3.8	\$800.00	\$3,040.00	Draft objections to Def Ex for JPTO; review JPTO; correspondence re same.
12/11/2022	Shira Gelfand	SZG	1.3	\$425.00	\$552.50	Review and edit JPTO; correspondence with GSC re exhibits and review same.
12/12/2022	Cara E. Greene	CEG	7.8	\$950.00	\$7,410.00	Review Defendant's objections to Plaintiff's exhibit list; M&C with Defendant re JPTO and exhibit lists; update same; correspondence and meetings with lit ops and SZG re finalizing and filing JPTO; correspondence with expert, opposing counsel re expert deposition; draft list of documents stipulations; update witness list to include witnesses to authenticate in the absence of stipulation; finalize and file JPTO.
12/12/2022	Gregory S. Chiarello	GSC	2.2	\$800.00	\$1,760.00	Correspondence with team (.1); review JPTO (.2); edit exhibit list and objections, conferences with SZG re same (1.9).
12/12/2022	Jennifer LaMarch	JLM	0.2	\$350.00	\$70.00	File joint pre-trial order.
12/12/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with TAM and SA re updated Admin Assignment Schedule, and legal assistant support for CEG, GSC, and SZG in advance of updating and circulating updated trial playbook.
12/12/2022	Napoleon Zapata	NAZ	1.1	\$325.00	\$357.50	Prepare updated draft of trial playbook containing updated trial prep deadlines and contact list
12/12/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Check in with VXY re joint pretrial order status, upcoming trial prep projects, and upcoming deadlines
12/12/2022	Shira Gelfand	SZG	11.9	\$425.00	\$5,057.50	Meet and confer with Google (.8); begin drafting motion in limine re Rensin (3.3); attention to final joint pre trial order and edit same; review of Google edits; compare lists; edit exhibit appendices and add objections, compare to previous versions, and attention to filing re same (6.7); draft letter to court re expert discovery and correspondence with expert re same (1.1).
12/12/2022	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Correspondence with CEG re drafted exhibits email.
12/12/2022	Vincent Yang	VXY	3.3	\$325.00	\$1,072.50	Review and reconcile Defendant's exhibit list with Plaintiff's objections; correspondence with SZG re same
12/12/2022	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Finalize joint pretrial order and prepare for filing
12/13/2022	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Prepare for team meeting and attend same.
12/13/2022	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Review and edit letter to Judge Schofield.
12/13/2022	Gregory S. Chiarello	GSC	0.3	\$800.00	\$240.00	Case management meeting re pre-trial tasks.
12/13/2022	Jennifer LaMarch	JLM	0.2	\$350.00	\$70.00	File letter motion for extension of time to complete expert discovery.
12/13/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare Ulku Rowe synced video depositions for attorney review and analysis.
12/13/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Demo YesLaw DVD software in advance of preparing guide for attorney use to review synced Ulku Rowe video depositions.
12/13/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Begin drafting email to CEG, SZG, GSC, VXY, RRX, and SXR re guide to use YesLaw DVD software to view synced Ulku Rowe video depositions.
12/13/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated draft of deposition log with updated list of video files received from Veritext of Ulku Rowe depositions.
12/13/2022	Shira Gelfand	SZG	3.8	\$425.00	\$1,615.00	Attention to letter to court re expert discovery (.6); review Order re same (.1); continue drafting letter motion re Rensin and review of deposition transcripts (2.6); team meeting (.5).

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
12/13/2022	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Format letter motion.
12/13/2022	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspondence with JLM re docketing deadlines.
12/13/2022	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Apply narrowed redactions to letter motion in opposition to de bene esse per court order
12/14/2022	Jennifer LaMarch	JLM	0.3	\$350.00	\$105.00	File redacted letter in opposition to de bene esse depositions.
12/14/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated draft of email to CEG, SZG, GSC, VXY, RRX, and SXR re guide to use YesLaw DVD software to view synced Ulku Rowe video depositions.
12/14/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with VXY, SXR, TAM, and RRX re workflow for updating trial exhibit binders to match final version of plaintiff trial exhibit list.
12/14/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with HJ, RRX, TAM, VXY, and SXR re preparing tabs for binders containing final plaintiff trial exhibits.
12/14/2022	Shira Gelfand	SZG	3.7	\$425.00	\$1,572.50	Attention to refiled redacted letter motion opposition (.5); continue drafting letter motion re Rensin (3.2)
12/14/2022	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspondence with JLM and SZG re filing unsealed letter motion.
12/15/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with VXY re workflow for updating trial exhibit binders to match final plaintiff exhibit list
12/15/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Prepare, finalize, and QC binders containing plaintiff trial exhibits so that they match final plaintiff trial exhibit list
12/15/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re meeting with VXY re workflow for updating trial exhibit binders to match final plaintiff exhibit list.
12/15/2022	Shira Gelfand	SZG	1.9	\$425.00	\$807.50	Draft update for firm (.1); correspondence with client (.1); draft letter motion re Rensin (1.7)
12/15/2022	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Update case file docket.
12/15/2022	Vincent Yang	VXY	1.2	\$325.00	\$390.00	Update internal exhibit lists re plaintiff and defendant proposed exhibits submitted on pretrial order
12/15/2022	Vincent Yang	VXY	2.7	\$325.00	\$877.50	Prepare and print binder re Defendant's proposed exhibit list.
12/16/2022	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Conference with client re next steps and trial.
12/16/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Prepare updated draft of trial playbook containing updated trial prep deadlines
12/16/2022	Shira Gelfand	SZG	1.7	\$425.00	\$722.50	Prep agenda for call with client (.3); call with client (1.1); Call with CEG (.3)
12/16/2022	Vincent Yang	VXY	1.9	\$325.00	\$617.50	Upload and send deposition videos and pretrial exhibits to client
12/19/2022	Gregory S. Chiarello	GSC	0.6	\$800.00	\$480.00	Edit Resnin MIL letter.
12/19/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with TAM, VXY, SXR, and RRX re filing and finalization of David Rensin letter motion
12/19/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Prepare updated draft of trial playbook containing updated trial prep deadlines
12/19/2022	Shira Gelfand	SZG	2.3	\$425.00	\$977.50	Edit and supplement letter with GSC edits; research re same and review deposition transcript
12/20/2022	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Review letter to court re Rensin testimony.
12/20/2022	Gregory S. Chiarello	GSC	0.4	\$800.00	\$320.00	Edit revised Resnin MIL letter.
12/20/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with SXR, VXY, and RRX re updates to binders containing deposition transcripts and digests
12/20/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Begin preparing binders containing all defendant trial exhibits for attorney review and analysis
12/20/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with RRX re workflow and paralegal coverage for updating binders containing plaintiff trial exhibits to match final plaintiff trial exhibit list.
12/20/2022	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Compare drafts of plaintiff trial exhibit lists to determine changes in advance of updating binders containing plaintiff trial exhibits to match final plaintiff trial exhibit list.
12/20/2022	Naomi Campusano	NCX	0.7	\$350.00	\$245.00	Create CaseMap database.
12/20/2022	Sylvie Rohrbaugh	SXR	1.1	\$325.00	\$357.50	Prepare deposition binders.
12/20/2022	Shira Gelfand	SZG	0.8	\$425.00	\$340.00	Edit and supplement letter motion; correspondence with GSC and CEG re same.
12/21/2022	Gregory S. Chiarello	GSC	0.1	\$800.00	\$80.00	Edit Reslin MIL letter, correspondence with SZG re same.
12/21/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with SXR re comparison of drafts of plaintiff trial exhibit lists to determine changes in advance of updating binders containing plaintiff trial exhibits to match final plaintiff trial exhibit list.
12/21/2022	Napoleon Zapata	NAZ	4.5	\$325.00	\$1,462.50	Continue preparing binders containing all defendant trial exhibits for attorney review and analysis
12/21/2022	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Finalize and QC binders containing all defendant trial exhibits for attorney review and analysis in advance of upcoming trial.
12/21/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with RRX, TAM, VXY, and SXR re next steps for finalizing binders containing all defendant trial exhibits.
12/21/2022	Naomi Campusano	NCX	0.4	\$350.00	\$140.00	Create TextMap database.
12/22/2022	Cara E. Greene	CEG	2.0	\$950.00	\$1,900.00	Team trial strategy planning meeting and prepare for same.
12/22/2022	Gregory S. Chiarello	GSC	3.1	\$800.00	\$2,480.00	Team meeting re trial preparation (2.5); Edit, review and finalize MIL pre-motion letter (.6)
12/22/2022	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Prepare updated draft of reformatted defendant exhibit list for use as binder index within binders containing all defendant exhibits.
12/22/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Follow up correspondence with RRX, TAM, VXY, and SXR re next steps for finalizing binders containing all defendant trial exhibits.
12/22/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with CEG, GSC, SZG, SXR, VXY, RRX, and TAM re status update pertaining to updating plaintiff trial exhibit binders to match final plaintiff trial exhibit list.
12/22/2022	Shira Gelfand	SZG	2.7	\$425.00	\$1,147.50	Team meeting (2.5); edit letter motion (.2).
12/23/2022	Jennifer LaMarch	JLM	0.2	\$350.00	\$70.00	File letter motion for leave to file motion in limine
12/23/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated draft of trial playbook with updated tab containing trial prep deadlines sorted in chron order, and updated contacts information.
12/23/2022	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Correspondence with RRX, TAM, VXY, SXR, SZG, GSC, and CEG re setup of binder sets containing expert documents, plaintiff exhibits, defendant exhibits, updates to existing binders, and witness binders.
12/23/2022	Napoleon Zapata	NAZ	1.1	\$325.00	\$357.50	Review correspondence and prepare questions re setup of binder sets containing expert documents, plaintiff exhibits, defendant exhibits, updates to existing binders, and witness binders in advance of preparing binders.
12/23/2022	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Begin preparing binders containing witness files for attorney review and analysis.
12/23/2022	Shira Gelfand	SZG	0.4	\$425.00	\$170.00	Attention to filing pre motion letter; review court order.
12/27/2022	Napoleon Zapata	NAZ	2.2	\$325.00	\$715.00	Begin preparing binder containing expert deposition, expert report, summary judgement memorandums of law, and 56.1 MSJ for attorney review and analysis.
12/27/2022	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Save motion and order re letter motion for leave to case file.
12/27/2022	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Review team correspondence re binders.
12/28/2022	Gregory S. Chiarello	GSC	0.6	\$800.00	\$480.00	Case management meeting with paralegals re trial preparation.
12/28/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with RRX and SDC re witness binder setup.
12/28/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with RRX, TAM, VXY, and SXR re documents to include within expert binders
12/28/2022	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Prepare and compile questions re setup of binder sets containing expert documents, plaintiff exhibits, defendant exhibits, updates to existing binders, and witness binders in advance of upcoming meeting with CEG, SZG, and GSC.
12/28/2022	Napoleon Zapata	NAZ	1.5	\$325.00	\$487.50	Review and compile notes re conference with GSC, SXR, SZG, and VXY re setup of binder sets containing expert documents, plaintiff exhibits, defendant exhibits, and updates to existing binders in advance of circulating meeting notes to Rowe paralegal team.
12/28/2022	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Conference with GSC, SXR, SZG, and VXY re setup of binder sets containing expert documents, plaintiff exhibits, defendant exhibits, and updates to existing binders for attorney review and analysis.
12/28/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with HJ, RRX, TAM, SXR, and VXY re upcoming binder projects
12/28/2022	Napoleon Zapata	NAZ	1.1	\$325.00	\$357.50	Continue preparing binder containing expert deposition, expert report, summary judgement memorandums of law, and 56.1 MSJ for attorney review and analysis.
12/28/2022	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated draft of deposition log.
12/28/2022	Sylvie Rohrbaugh	SXR	0.6	\$325.00	\$195.00	Telephone conference with SZG, GSC, NAZ, and VXY re preparation of binders in advance of trial
12/28/2022	Sylvie Rohrbaugh	SXR	0.1	\$325.00	\$32.50	Review team correspondence re binders.

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
12/28/2022	Shira Gelfand	SZG	0.9	\$425.00	\$382.50	Draft response to performance evaluation (.3); team meeting (.6).
12/28/2022	Vincent Yang	VXY	0.6	\$325.00	\$195.00	Telephone conference with SZG, GSC, NAZ, and SXR re preparation of binders in advance of trial
12/29/2022	Gregory S. Chiarello	GSC	0.1	\$800.00	\$80.00	Review draft email from client.
12/29/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with VXY, SXR, RRX, and TAM re the use of unredacted pleadings in binders
12/29/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with SZG, RRX, TAM, VXY, and SXR re summary judgment memorandums of law to include within expert deposition binder.
12/29/2022	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Continue preparing binder containing expert deposition, expert report, summary judgement memorandums of law, and 56.1 MSJ for attorney review and analysis.
12/29/2022	Napoleon Zapata	NAZ	1.9	\$325.00	\$617.50	Prepare binder containing deposition digests and transcripts for attorney review and analysis
12/29/2022	Napoleon Zapata	NAZ	2.1	\$325.00	\$682.50	Begin preparing witness binders containing deposition digests, deposition transcripts, affidavits, deposition exhibits introduced for deponent, documents where the witness is a sender or recipient, and previously marked exhibits.
12/29/2022	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Prepare updated draft of deposition log.
12/29/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with HJ, RRX, TAM, VXY, and SXR re printing, assembly and drop off of binder containing expert report, summary judgment, memorandums of law, and 56.1 MSJ for attorney review and analysis.
12/29/2022	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with HJ, RRX, TAM, VXY, and SXR re printing and assembly of binder containing deposition digests and transcripts for attorney review and analysis.
12/29/2022	Napoleon Zapata	NAZ	1.5	\$325.00	\$487.50	Draft an accounting of pending binder projects, and status updates for each of them in advance of transition to other matters.
12/29/2022	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Correspondence with client.
12/30/2022	Hector Jacome	HJ	1.0	\$150.00	\$150.00	Print Expert Deposition and Deposition Digest requests, coordinated with Napoleon Zapata; binders were delivered to Cara and Sylvie.
12/30/2022	Sylvie Rohrbaugh	SXR	0.1	\$325.00	\$32.50	Correspondence with VXY re witness binders.
01/03/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with SZG, VXY, SXR, RRX, HJ, and TAM re expert binder status update
01/03/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with SXR re workflow for tracking binder status and delivery for pending binders for attorney review and analysis.
01/03/2023	Naomi Campusano	NCX	1.0	\$350.00	\$350.00	Import transcript into TextMap.
01/03/2023	Naomi Campusano	NCX	0.1	\$350.00	\$35.00	Correspondence with RRS re importing transcripts.
01/04/2023	Naomi Campusano	NCX	0.6	\$350.00	\$210.00	Meeting with RSR re importing transcript into TextMap.
01/04/2023	Sylvie Rohrbaugh	SXR	0.2	\$325.00	\$65.00	Correspond with VXY re trial binders.
01/04/2023	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence re binders.
01/04/2023	Vincent Yang	VXY	3.8	\$325.00	\$1,235.00	Review Plaintiff and Defendant exhibit binders for updates, correspond with SXR re same; begin compiling witness binders.
01/05/2023	Cara E. Greene	CEG	3.3	\$950.00	\$3,135.00	Prepare for expert deposition prep (.8); conference with expert, SZG, GSC to prepare for deposition (2.5)
01/05/2023	Gregory S. Chiarello	GSC	2.6	\$800.00	\$2,080.00	Correspondence with VXY re witness binders (.2); N. Ostrofe preparation meeting (2.4)
01/05/2023	Sylvie Rohrbaugh	SXR	0.2	\$325.00	\$65.00	Check on status of trial exhibit binders and correspond with VXY re same
01/05/2023	Sylvie Rohrbaugh	SXR	6.0	\$325.00	\$1,950.00	Prepare trial exhibit binders.
01/05/2023	Shira Gelfand	SZG	3.0	\$425.00	\$1,275.00	Meeting with expert and correspondence re same.
01/05/2023	Vincent Yang	VXY	5.6	\$325.00	\$1,820.00	Compile witness trial binders; create index re same and pull documents.
01/06/2023	Sylvie Rohrbaugh	SXR	3.5	\$325.00	\$1,137.50	Prepare trial exhibit binder.
01/06/2023	Sylvie Rohrbaugh	SXR	3.0	\$325.00	\$975.00	Prepare trial exhibit binder.
01/06/2023	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Review Google's letter response re David Rensin.
01/06/2023	Vincent Yang	VXY	3.8	\$325.00	\$1,235.00	Further compile witness binders and indexes.
01/09/2023	Sylvie Rohrbaugh	SXR	0.4	\$325.00	\$130.00	Prepare exhibit binders.
01/09/2023	Sylvie Rohrbaugh	SXR	6.3	\$325.00	\$2,047.50	Prepare trial exhibit binders.
01/09/2023	Sylvie Rohrbaugh	SXR	0.1	\$325.00	\$32.50	Correspond with VXY re witness binders.
01/09/2023	Sylvie Rohrbaugh	SXR	0.1	\$325.00	\$32.50	Correspond with VXY re trial exhibit binders.
01/09/2023	Shira Gelfand	SZG	0.4	\$425.00	\$170.00	Call with expert and correspondence re same.
01/09/2023	Vincent Yang	VXY	5.7	\$325.00	\$1,852.50	Further compile witness binders and indexes.
01/10/2023	Sylvie Rohrbaugh	SXR	3.5	\$325.00	\$1,137.50	Prepare witness exhibit binders.
01/10/2023	Sylvie Rohrbaugh	SXR	1.2	\$325.00	\$390.00	Prepare witness binders for trial.
01/10/2023	Sylvie Rohrbaugh	SXR	2.1	\$325.00	\$682.50	Prepare witness trial binders.
01/10/2023	Sylvie Rohrbaugh	SXR	0.3	\$325.00	\$97.50	Prepare trial witness binder.
01/10/2023	Shira Gelfand	SZG	0.7	\$425.00	\$297.50	Call with expert (.1); review expert materials (.2); prep for deposition (.2); correspondence with team (.2)
01/10/2023	Vincent Yang	VXY	5.1	\$325.00	\$1,657.50	Further prepare and index witness binders.
01/11/2023	Cara E. Greene	CEG	3.9	\$950.00	\$3,705.00	Finish preparing for expert deposition; defend expert deposition (3.5); conference with GSC re same (.4)
01/11/2023	Gregory S. Chiarello	GSC	4.9	\$800.00	\$3,920.00	Correspondence with Ostrofe (.2); Ostrofe deposition (4.7).
01/11/2023	Sylvie Rohrbaugh	SXR	3.0	\$325.00	\$975.00	Prepare witness exhibit binders for trial.
01/11/2023	Sylvie Rohrbaugh	SXR	0.7	\$325.00	\$227.50	Prepare witness exhibit binders.
01/11/2023	Sylvie Rohrbaugh	SXR	0.1	\$325.00	\$32.50	Correspondence with VXY re binders to prepare for trial
01/11/2023	Sylvie Rohrbaugh	SXR	0.1	\$325.00	\$32.50	Correspondence with VXY re binders to prepare.
01/11/2023	Shira Gelfand	SZG	4.3	\$425.00	\$1,827.50	Attend expert deposition.
01/11/2023	Vincent Yang	VXY	4.4	\$325.00	\$1,430.00	Further prepare witness binders and index.
01/12/2023	Sylvie Rohrbaugh	SXR	2.6	\$325.00	\$845.00	Prepare witness exhibit binders.
01/12/2023	Sylvie Rohrbaugh	SXR	1.4	\$325.00	\$455.00	Prepare witness binders.
01/12/2023	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with expert.
01/13/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Update case docket.
01/17/2023	Naomi Campusano	NCX	0.5	\$350.00	\$175.00	Create annotation report in TextMap and correspond with RSR re same.
01/17/2023	Shira Gelfand	SZG	0.3	\$425.00	\$127.50	Correspondence with client; attention to document production
01/17/2023	Vincent Yang	VXY	0.7	\$325.00	\$227.50	Download and correspond with Nuix team to import Defendant production
01/18/2023	Gregory S. Chiarello	GSC	0.2	\$800.00	\$160.00	Team correspondence re supplement to expert report.
01/18/2023	Shira Gelfand	SZG	0.7	\$425.00	\$297.50	Call with expert (.2); correspondence with team (.2); review letter to court (.3).
01/18/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspondence with SZG re Defendant's production review.
01/18/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Pull Nuix documents for SZG review and correspondence re same.
01/18/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Save letter motions and order re expert extension to case file.
01/19/2023	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence with GSC re expert testimony and report.
01/19/2023	Gregory S. Chiarello	GSC	0.3	\$800.00	\$240.00	Conferences with SZF, CEG re supplementing expert report.
01/19/2023	Shira Gelfand	SZG	0.8	\$425.00	\$340.00	Correspondence with team (1); review of documents re equity grants (4); call with GSC re expert report (.3)
01/19/2023	Vincent Yang	VXY	4.4	\$325.00	\$1,430.00	Supplement witness binders re addition document production from Defendants
01/19/2023	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Research Nuix and correspond with SZG re comparator equity grand documents
01/20/2023	Cara E. Greene	CEG	0.7	\$950.00	\$665.00	Telephone call with GSC re supplemental expert report (.4); telephone call with damages expert re supplemental report (.2); correspondence with opposing counsel re same (.1).
01/20/2023	Sylvie Rohrbaugh	SXR	0.8	\$325.00	\$260.00	Prepare and send file transfers re expert witness.
01/20/2023	Sylvie Rohrbaugh	SXR	0.2	\$325.00	\$65.00	Correspond with VXY re FTP.
01/20/2023	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Correspondence with counsel; correspondence with expert and team.
01/20/2023	Vincent Yang	VXY	4.4	\$325.00	\$1,430.00	Update witness binders per Defendant's recent production.
01/22/2023	Gregory S. Chiarello	GSC	2.0	\$800.00	\$1,600.00	Conferences with CEG re expert report (.5); review N. Ostrofe Day 1 deposition transcript (1.5)

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
01/25/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Print binder spines re defendant exhibit binders and finalize
01/26/2023	Gregory S. Chiarello	GSC	0.2	\$800.00	\$160.00	Research re new judge; conference with SZG re same.
01/27/2023	Cara E. Greene	CEG	1.9	\$950.00	\$1,805.00	Review, edit, and finalize supplemental expert report, calls with expert re same, conferences with GSC re same
01/27/2023	Gregory S. Chiarello	GSC	0.7	\$800.00	\$560.00	Review expert report with SZG; correspondence with team re supplemental report.
01/27/2023	Shira Gelfand	SZG	2.5	\$425.00	\$1,062.50	Correspondence with client (.2); attention to revising expert report, calls with team and expert re same (2.3)
01/30/2023	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Call court with Google.
02/02/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Calendar deadlines re judge reassignment.
02/02/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Save order re case reassignment to case file.
02/03/2023	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Review and edit joint letter to the Court.
02/03/2023	Shira Gelfand	SZG	1.1	\$425.00	\$467.50	Draft joint letter to court and review edits re same.
02/03/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Add attorney signatures to joint letter.
02/06/2023	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Review and edit joint letter to opposing counsel, and correspondence with opposing counsel re same
02/06/2023	Shira Gelfand	SZG	0.3	\$425.00	\$127.50	Edit joint letter to the court and correspondence re same.
02/08/2023	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Correspondence with trial team, opposing counsel re trial dates and letter to court
02/08/2023	Gregory S. Chiarello	GSC	0.3	\$800.00	\$240.00	Correspondence with K. Gage re preconference letter.
02/08/2023	Shira Gelfand	SZG	0.5	\$425.00	\$212.50	Correspondence and attention to joint letter.
02/09/2023	Jennifer LaMarch	JLM	0.2	\$350.00	\$70.00	File status letter.
02/09/2023	Shira Gelfand	SZG	0.4	\$425.00	\$170.00	Attention to finalizing joint letter to court and filing re same; correspondence re status conference
02/09/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Conference with RRX re trial logistics and pending deadlines.
02/09/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Finalize joint letter to Judge Rearden.
02/09/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Review Judge Rearden individual rules and practices.
02/10/2023	Shira Gelfand	SZG	1.3	\$425.00	\$552.50	Prep for court conference and attend court conference (1); debrief with CEG (.1); correspondence with client and paralegals (.2).
02/10/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Save conformed status letter to case file.
02/13/2023	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Review Court order; correspondence with team.
02/14/2023	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with client.
02/15/2023	Naomi Campusano	NCX	0.4	\$350.00	\$140.00	Create sanction casebook.
02/15/2023	Naomi Campusano	NCX	1.2	\$350.00	\$420.00	Import plaintiff and defendant's exhibit into sanction and email VXY re same
02/15/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Correspondence with NCX re exhibit upload to Sanction.
02/16/2023	Cara E. Greene	CEG	0.5	\$950.00	\$475.00	Telephone call with client re status.
02/16/2023	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Correspondence with SZG, opposing counsel re mediation dates.
02/16/2023	Shira Gelfand	SZG	1.0	\$425.00	\$425.00	Call with client re status (.5); call with CEG re mediation dates (.3); correspondence with counsel re mediation dates (.2).
02/17/2023	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Attention to mediation availability; correspondence with Judge Willis; correspondence with CEG re same
02/21/2023	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Attention to settlement conference date; correspondence with client re same.
02/23/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Save order to case file.
02/28/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Correspond with NAZ re binders updates.
03/02/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Update Attorney/Staff section in Milana.
03/06/2023	Gregory S. Chiarello	GSC	0.1	\$800.00	\$80.00	Conference with SZG re O&G and Rowe availability for rescheduled trial
03/06/2023	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with counsel.
03/09/2023	Vincent Yang	VXY	0.8	\$325.00	\$260.00	Package and move trial binders.
03/20/2023	Cara E. Greene	CEG	0.8	\$950.00	\$760.00	Calculate damages to make settlement demand (.6); correspondence with client and opposing counsel re same (.2)
03/20/2023	Shira Gelfand	SZG	4.3	\$425.00	\$1,827.50	Draft mediation statement (3.9); correspondence with CEG re same (.3); correspondence with client (.1)
03/21/2023	Cara E. Greene	CEG	1.1	\$950.00	\$1,045.00	Review settlement communication to court and edit same.
03/21/2023	Gregory S. Chiarello	GSC	0.5	\$800.00	\$400.00	Edit mediation statement (.3); review/respond to mediation/trial correspondence (.2)
03/21/2023	Shira Gelfand	SZG	3.4	\$425.00	\$1,445.00	Continue drafting settlement conference letter and editing same (3.2); correspondence with CEG and GSC (.2)
03/22/2023	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Attention to courtesy copy to court.
03/22/2023	Vincent Yang	VXY	0.8	\$325.00	\$260.00	Prepare courtesy copy binder and FedEx label re courtesy copies for settlement conference
03/23/2023	Cara E. Greene	CEG	1.8	\$950.00	\$1,710.00	Prepare damages probability chart for settlement conference (.8); telephone call with client re settlement conference strategy and prepare for same (1.0).
03/23/2023	Gregory S. Chiarello	GSC	0.9	\$800.00	\$720.00	Telephone call with client, CEG, SZG.
03/23/2023	Shira Gelfand	SZG	1.8	\$425.00	\$765.00	Call with client; team meeting; correspondence with counsel; attention to letter to court
03/24/2023	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Correspondence with SZG re letter to court and review same; prepare for settlement conference
03/24/2023	Shira Gelfand	SZG	0.3	\$425.00	\$127.50	Attention to letter to court re devices.
03/24/2023	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Prepare mediation binder.
03/27/2023	Hector Jacome	HJ	0.5	\$150.00	\$75.00	Prepared Mediation binder sets.
03/27/2023	Shira Gelfand	SZG	0.8	\$425.00	\$340.00	Correspondence with team and prep for settlement conference; call with court re devices; correspondence with client.
03/27/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Add document to mediation binder and correspondence with HJ re preparation
03/28/2023	Cara E. Greene	CEG	6.3	\$950.00	\$5,985.00	Attend settlement conference and prepare for same.
03/28/2023	Cara E. Greene	CEG	0.5	\$475.00	\$237.50	Travel to courthouse.
03/28/2023	Gregory S. Chiarello	GSC	5.8	\$800.00	\$4,640.00	SDNY Settlement Conference.
03/28/2023	Shira Gelfand	SZG	7.1	\$425.00	\$3,017.50	Prep for and attend settlement conference.
03/30/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Save minute entry and joint letter to case file.
03/31/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with SZG, VXY, AMX, and JLM re trial ready dates to add to docketing calendar
03/31/2023	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with Rearden chambers re trial scheduling; correspondence with client re same
04/03/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Follow up correspondence with RRX, SZG, VXY, and JLM re updated trial ready dates to add to docketing calendar
04/03/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Call with RRX re updated trial ready dates to add to docketing calendar, and removal of notifications for old pretrial dates that cannot be adjourned due to the lack of updated pretrial dates approved by the Court.
04/03/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Review and compile notes re call with RRX re updated trial ready dates to add to docketing calendar, and removal of notifications for old pretrial dates that cannot be adjourned due to the lack of updated pretrial dates approved by the Court.
04/03/2023	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence re expert bill.
04/07/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Follow up correspondence with SZG, and VXY re trial ready dates to add to docketing calendar
04/19/2023	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence with GSC re planning meeting.
04/20/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Review Rowe files in Filevine.
04/25/2023	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Schedule team meeting.
04/27/2023	Cara E. Greene	CEG	1.8	\$950.00	\$1,710.00	Trial preparation meeting and prepare for same (1.7); correspondence with opposing counsel (.1)
04/27/2023	Gregory S. Chiarello	GSC	1.2	\$800.00	\$960.00	Trial preparation meeting with SZG, CEG.
04/27/2023	Shira Gelfand	SZG	1.4	\$425.00	\$595.00	Team meeting re trial preparation (1.2); draft email to opposing counsel (.1); attention to scheduling items (.1)
04/27/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspondence with CEG re documents and binders for case.
04/28/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	In Row Read Complaints, Answers and review file materials to get up to speed on case.
04/28/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	In Row Read Complaints, Answers and review file materials to get up to speed on case.
04/28/2023	Cara E. Greene	CEG	0.6	\$950.00	\$570.00	Edit letter to opposing counsel re discovery (.2); edit trial task list (.4)
04/28/2023	Shira Gelfand	SZG	0.5	\$425.00	\$212.50	Correspondence with team; correspondence with client; correspondence with counsel
05/02/2023	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with counsel.

Rowe v. Google LLC
Case No. 19-cv-08655 (JHR)
Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
05/04/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with VXY re project status and upcoming trial prep projects in advance of trial
05/04/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Prepare updated draft of Rowe document status update in advance of circulating
05/04/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting and follow up correspondence with VXY re project status and upcoming trial prep projects in advance of trial.
05/04/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Review and compile notes re meeting and follow up correspondence with VXY re project status and upcoming trial prep projects in advance of trial.
05/04/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Correspondence with NAZ re project status and upcoming trial prep projects in advance of trial
05/04/2023	Vincent Yang	VXY	1.3	\$325.00	\$422.50	Prepare list re documents status in preparation for trial.
05/08/2023	Shira Gelfand	SZG	0.5	\$425.00	\$212.50	Call with CEG; correspondence with counsel; correspondence with expert.
05/10/2023	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Call with expert; correspondence with CEG.
05/11/2023	Shira Gelfand	SZG	0.6	\$425.00	\$255.00	Call with counsel.
05/12/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Correspondence with SZG and VXY re accessing and downloading production from opposing counsel in advance of ingesting to Nuix.
05/12/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with ERA, NCC, and GHK re ingesting opposing counsel production into Nuix
05/12/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Draft FTP correspondence to send expert Nora Ostrofe Prod031 production from opposing counsel for review and analysis.
05/12/2023	Naomi Campusano	NCX	1.6	\$350.00	\$560.00	Import defendant's production into Nuix.
05/12/2023	Shira Gelfand	SZG	1.6	\$425.00	\$680.00	Correspondence with CEG (.1); call with counsel and court (.3); draft email to court (.2); attention to production and correspondence with expert (1).
05/12/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspondence with NAZ re production ingestion.
05/15/2023	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Review correspondence from court and correspondence with trial team re same
05/15/2023	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Correspondence with Chambers and team.
05/15/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Update document status tracker.
05/15/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Set up Anora v. Oasis docket tracker and pull pretrial order.
05/23/2023	Cara E. Greene	CEG	3.5	\$950.00	\$3,325.00	Prepare for trial planning meeting (1.3); trial planning meeting (2.0); follow-up from trial planning meeting (.2)
05/23/2023	Gregory S. Chiarello	GSC	2.0	\$800.00	\$1,600.00	Team meeting re trial preparation.
05/23/2023	Shira Gelfand	SZG	3.2	\$425.00	\$1,360.00	Team meeting re trial prep and circulate task list (2); correspondence with GSC and CEG re same (1.2)
05/23/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Correspondence with SZG re trial calendar entry.
05/23/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspondence with SZG re video depositions.
05/23/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Research status of Judge Rearden's other trial case.
05/23/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Attend to pre-trial task list.
05/24/2023	Cara E. Greene	CEG	1.1	\$950.00	\$1,045.00	Follow-up from trial planning meeting, schedule coordination, memo re tasks, etc
05/24/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Reschedule meeting with RRX re trial tech.
05/25/2023	Cara E. Greene	CEG	1.3	\$950.00	\$1,235.00	Trial prep scheduling, correspondence re appearance of witnesses, organize trial materials
05/25/2023	Jennifer LaMarch	JLM	0.2	\$350.00	\$70.00	Accurint search.
05/25/2023	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Attention to trial prep and binders; correspondence re meetings with client
05/25/2023	Vincent Yang	VXY	2.1	\$325.00	\$682.50	Prepare witness spreadsheet; prepare subpoenas for witnesses N. Harteau and S. Breslow and perform address search.
05/25/2023	Vincent Yang	VXY	1.7	\$325.00	\$552.50	Organize trial binders in conference room.
05/25/2023	Vincent Yang	VXY	2.6	\$325.00	\$845.00	Prepare CEG trial binder.
05/26/2023	Shira Gelfand	SZG	0.4	\$425.00	\$170.00	Draft correspondence with counsel; correspondence with witness attorney.
05/30/2023	Cara E. Greene	CEG	4.2	\$950.00	\$3,990.00	Review deposition transcripts in advance of witness objective outlines.
05/30/2023	Gregory S. Chiarello	GSC	0.8	\$800.00	\$640.00	Review U. Rowe deposition.
05/30/2023	Vincent Yang	VXY	0.4	\$325.00	\$130.00	Conference with RRX re trial software.
05/30/2023	Vincent Yang	VXY	0.8	\$325.00	\$260.00	Update witness list spreadsheet.
05/31/2023	Shira Gelfand	SZG	0.1	\$425.00	\$42.50	Correspondence with CEG re witness testimony.
06/01/2023	Cara E. Greene	CEG	0.7	\$950.00	\$665.00	Correspondence re witness availability (.2); trial strategy meeting (.5).
06/01/2023	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence re witness availability.
06/01/2023	Gregory S. Chiarello	GSC	0.4	\$800.00	\$320.00	Correspondence, conferences with team re witnesses.
06/01/2023	Shira Gelfand	SZG	0.7	\$425.00	\$297.50	Case management meeting (.5); review of exhibits (.1); correspondence with team re witness testimony (.1).
06/01/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspondence with SZG re exhibit list.
06/02/2023	Gregory S. Chiarello	GSC	0.7	\$800.00	\$560.00	Conference with SZG re preservation research (.2); draft Rowe direct examination outline (.5)
06/02/2023	Shira Gelfand	SZG	1.6	\$425.00	\$680.00	Call with law clerk re memo; call with GSC re same (.2); attention to deposition designations and witness availability (1.2); review of exhibits (.2).
06/02/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Schedule meeting with RRX re trial tech.
06/05/2023	Shira Gelfand	SZG	0.7	\$425.00	\$297.50	Call with expert (.3); correspondences with team and counsel (.4).
06/05/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Correspondence with SZG re trial task list.
06/05/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Check status of Anora v. Oasis case.
06/06/2023	Gregory S. Chiarello	GSC	2.4	\$800.00	\$1,920.00	Review case materials and draft Rowe direct examination (1.4); team meeting (1.0).
06/06/2023	Shira Gelfand	SZG	3.7	\$425.00	\$1,572.50	Draft and circulate agenda for team meeting (.3); team meeting (1); prepare task list and updates re witness availability, deadlines and tasks (.4); correspondence with expert (.2); correspondence with client (.2); review documents and begin drafting Ben Wilson script for witness call (1.5).
06/06/2023	Vincent Yang	VXY	2.4	\$325.00	\$780.00	Prepare trial documents for import to Textmap and Sanction; utilize Sanction software
06/06/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspondence with GC re trial binder statuses.
06/06/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Correspondence with SZG and search case file re synced video transcripts.
06/07/2023	Gregory S. Chiarello	GSC	2.2	\$800.00	\$1,760.00	Review case materials and draft Rowe direct examination.
06/07/2023	NY Law Clerk	NYLC	0.8	\$325.00	\$260.00	Research witness requirements at trial.
06/07/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with VXY re deposition transcripts status updates, and workflow for Attorneys to review synced deposition video transcripts in TextMap.
06/07/2023	Shira Gelfand	SZG	2.5	\$425.00	\$1,062.50	Correspondence with team and expert and OC (.3); review law clerk research (.5); call with Ben Wilson (left vm) (.1); continue drafting script for call (.6); attention to research assignment re 30(b)(6) witness (1.0).
06/07/2023	Vincent Yang	VXY	5.2	\$325.00	\$1,690.00	Import transcripts and exhibits into Sanction and Textmap; review functionality and presentation
06/08/2023	NY Law Clerk	NYLC	1.5	\$325.00	\$487.50	Research witness requirements at trial.
06/08/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with ALR re upcoming projects and division of labor
06/08/2023	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Upload and organize discovery requests to Sanction.
06/08/2023	Vincent Yang	VXY	1.2	\$325.00	\$390.00	Telephone conference with RRX re trial Sanction and Textmap software.
06/08/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Conference with NCX re Textmap access.
06/08/2023	Vincent Yang	VXY	0.4	\$325.00	\$130.00	Correspondence to SZG re trial agenda.
06/09/2023	Gregory S. Chiarello	GSC	2.5	\$800.00	\$2,000.00	Review case materials and draft Rowe direct examination (1.9); conferences with SZG (.6).
06/09/2023	NY Law Clerk	NYLC	0.1	\$325.00	\$32.50	Confer with SZG on witness availability question.
06/09/2023	NY Law Clerk	NYLC	1.1	\$325.00	\$357.50	Research witness requirements.
06/09/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Check in with VXY re case management.
06/09/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Review correspondence re from VXY, NAZ re exhibit binders
06/09/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with RRX, TAM, VXY, MSY, and SZG re preparing stamped trial exhibits for printing in advance of upcoming submission to the Court.

Rowe v. Google LLC
Case No. 19-cv-08655 (JHR)
Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
06/09/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with VXY and RRX re preparation of deposition synopsis in advance of submitting deposition transcripts with designations to the Court.
06/09/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and compile notes re preparation of deposition synopsis in advance of submitting deposition transcripts with designations to the Court.
06/09/2023	Shira Gelfand	SZG	4.3	\$425.00	\$1,827.50	Review of exhibits for exhibits to mark for advance Ruling Requested (3.4); correspondence with team and counsel (.3); call with GSC (.6).
06/09/2023	Vincent Yang	VXY	2.2	\$325.00	\$715.00	Prepare stamped exhibits re Court copy; import discovery papers to Sanction.
06/09/2023	Vincent Yang	VXY	1.1	\$325.00	\$357.50	Upload deposition videos to textmap and review sanction presentation format.
06/12/2023	Gregory S. Chiarello	GSC	2.4	\$800.00	\$1,920.00	Draft Rowe examination outlines, review matter documents in connection with same
06/12/2023	NY Law Clerk	NYLC	1.4	\$325.00	\$455.00	Researching obligation to produce witness at trial.
06/12/2023	Makaria S. Yami	MSY	0.3	\$325.00	\$97.50	Research SDNY and Judge's local rules.
06/12/2023	Makaria S. Yami	MSY	0.2	\$325.00	\$65.00	Correspondence with NAZ re Judge's local rules and case reassignment.
06/12/2023	Makaria S. Yami	MSY	0.3	\$325.00	\$97.50	Research SDNY and Judge's local rules.
06/12/2023	Makaria S. Yami	MSY	0.2	\$325.00	\$65.00	Correspondence with NAZ re Judge's local rules and case reassignment.
06/12/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Review correspondence from NAZ re printing exhibit binders
06/12/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with MSY re Judge Jennifer H. Rearden's rules.
06/12/2023	Napoleon Zapata	NAZ	1.7	\$325.00	\$552.50	Review local rules, and Judge Jennifer H. Rearden's rules in advance of upcoming 6/23/23 submission of trial exhibits and updated joint pretrial order to the Court.
06/12/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Correspondence with RRX, VXY, TAM, and MSY re upcoming 6/23/23 submission of trial exhibits and updated joint pretrial order to the Court.
06/12/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with Transperfect Legal Services re upcoming print request re 6/23/23 submission of trial exhibits and updated joint pretrial order to the Court.
06/12/2023	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Conference with RRX re upcoming 6/23/23 submission of trial exhibits and updated joint pretrial order to the Court, trial prep projects, and status updates.
06/12/2023	Shira Gelfand	SZG	3.8	\$425.00	\$1,615.00	Correspondence with counsel (.2); review of exhibits and complete objections with advanced ruling requested designations (1.6); review of 2023 productions in Nuix and correspond with GSC and CEG re same (.8); begin reviewing 56.1 statements in advance of team meeting (1.2).
06/12/2023	Vincent Yang	VXY	6.4	\$325.00	\$2,080.00	Add deposition designations to Textmap; create trial software presentation agenda; navigate transcript annotating functionality.
06/12/2023	Vincent Yang	VXY	6.4	\$325.00	\$2,080.00	Add deposition designations to Textmap; create trial software presentation agenda; navigate transcript annotating functionality.
06/13/2023	Cara E. Greene	CEG	3.2	\$950.00	\$3,040.00	Correspondence re witness availability and review memo re same (.4); review transcripts and deposition designations for Erurek and Lucas (2.8).
06/13/2023	Gregory S. Chiarello	GSC	1.4	\$800.00	\$1,120.00	Review Rowe exhibit binder (.9); conference with SZG re B. Wilson (.3); conference with SZG re K. Lucas (.2)
06/13/2023	Shira Gelfand	SZG	2.8	\$425.00	\$1,190.00	Correspondence with VXY re trial updates and tech presentation (.2); correspondence with team re agenda and tasks (.3); review law clerk research and correspondence with team re same (1.1); brief research re 30b6 witness and trial availability (.5); call with witness Ben Wilson (.2); meeting with GSC and correspondence with team re same (.5).
06/13/2023	Shira Gelfand	SZG	0.3	\$425.00	\$127.50	Correspondence with expert and review of documents.
06/13/2023	Vincent Yang	VXY	2.1	\$325.00	\$682.50	Further prepare trial tech agenda and review annotation tools.
06/13/2023	Vincent Yang	VXY	0.4	\$325.00	\$130.00	Prepare deposition designation transcripts with highlights to Court.
06/13/2023	Vincent Yang	VXY	1.1	\$325.00	\$357.50	Conference with RRX re trial tech and deadlines.
06/13/2023	Vincent Yang	VXY	2.2	\$325.00	\$715.00	Prepare presentation technology re trial technology and load video files onto laptop
06/14/2023	Cara E. Greene	CEG	1.5	\$950.00	\$1,425.00	Team meeting re trial planning and deposition strategy.
06/14/2023	Gregory S. Chiarello	GSC	1.7	\$800.00	\$1,360.00	Case management meeting re trial preparations (1.5); conference with SZG re subpoenas (.2)
06/14/2023	NY Law Clerk	NYLC	0.4	\$325.00	\$130.00	Confer with SZG about research for witness availability cases.
06/14/2023	NY Law Clerk	NYLC	1.2	\$325.00	\$390.00	Research witness unavailability claims.
06/14/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Review correspondence from SZG re task list and agenda.
06/14/2023	Shira Gelfand	SZG	3.3	\$425.00	\$1,402.50	Circulate updated agenda and task list (.2); team meeting (1.5); correspondence with expert (.1); review filing from Google (.2); research re 30(b)(6) witness and unavailability and meeting with law clerk re same; review memo (1.3).
06/14/2023	Vincent Yang	VXY	4.1	\$325.00	\$1,332.50	Transfer exhibits and transcripts to presentation software; finalize agenda and circulate
06/15/2023	Abigail L. Robinson	ALR	1.4	\$325.00	\$455.00	Attend training on trial technology.
06/15/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review email from NAZ with ToDos.
06/15/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review agenda for meeting on trial tech.
06/15/2023	Cara E. Greene	CEG	1.7	\$950.00	\$1,615.00	Trial tech meeting with lit support (1.3); conference with SZG re excel spreadsheet exhibits (.2); correspondence re expert report (.2).
06/15/2023	Cara E. Greene	CEG	1.6	\$950.00	\$1,520.00	Edit to letter to expert (.2); review depositions in preparation for witness objective outlines (1.4)
06/15/2023	Gregory S. Chiarello	GSC	1.3	\$800.00	\$1,040.00	Trial tech meeting.
06/15/2023	NY Law Clerk	NYLC	1.2	\$325.00	\$390.00	Research employer-control doctrine for witness availability.
06/15/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Review correspondence from SZG and VXY re exhibit list.
06/15/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Review correspondence from TAM and NAZ re delivering exhibits to Court
06/15/2023	Makaria S. Yami	MSY	0.2	\$325.00	\$65.00	Review notes from NAZ re Trial Tech Meeting.
06/15/2023	Napoleon Zapata	NAZ	1.6	\$325.00	\$520.00	Conference with VXY, RRX, ALR, CEG, GSC, and SZG re Rowe trial technology demo
06/15/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meetings with HJ and VXY re setup of courier to hand deliver boxes to Court for 6/23/23 submission to Court
06/15/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with HJ, VXY, RRX, TAM, MSY, and ALR re setup of courier to hand deliver boxes to Court for 6/23/23 submission to Court.
06/15/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review Judge's rules re hand delivery of boxes to Court in advance of upcoming 6/23/23 submission to Court
06/15/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and compile notes re conference with VXY, RRX, ALR, CEG, GSC, and SZG re Rowe trial technology demo
06/15/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Create Filevine Tasks re trial technology demo.
06/15/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Meetings with RRX re workflow for upcoming trial prep projects pertaining to upcoming 2/23/23 submission of trial exhibits and designated depositions to the Court.
06/15/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Review and compile notes re meeting with RRX re workflow for upcoming trial prep projects pertaining to upcoming 2/23/23 submission of trial exhibits and designated depositions to the Court.
06/15/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with SZG and VXY re additional deposition designations
06/15/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review Judge's rules re hand delivery of boxes to Court in advance of upcoming 6/23/23 submission to Court
06/15/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Begin updating deposition designations in advance of upcoming 6/23/23 submission of deposition transcripts with designations to Court.
06/15/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with SZG, VXY, RRX, TAM, MSY, and ALR re color coding for deposition designations, and text format for manually creating deposition objections.
06/15/2023	Naomi Campusano	NCX	0.5	\$350.00	\$175.00	Create CaseMap and TimeMap account for CGX and correspond with IT re installing CaseMap suite to CGX computer.
06/15/2023	Robert S. Rivera	RRX	1.6	\$350.00	\$560.00	Conference with CEG, GSC, SZG, ALR, VXY and NAZ regarding trial technology demo
06/15/2023	Shira Gelfand	SZG	3.5	\$425.00	\$1,487.50	Trial tech meeting (1.3); meeting with CEG (.2); attention to Kevin Lucas exhibits and depo designations (1.1); meeting with RR re paralegal staffing (.2); correspondence with counsel (.1); correspondence with Harteau attorney re service of process (.1); attention to exhibit lists and excel formatting (.3); correspondence with expert (.2).
06/15/2023	Shira Gelfand	SZG	0.0	\$0.00	\$0.00	Correspondence with MLS re press (.1)(no charge).

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
06/15/2023	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Prepare and setup trial technology presentation.
06/15/2023	Vincent Yang	VXY	1.4	\$325.00	\$455.00	Conference with CEG, GC, SZG, NAZ, RRR re presentation on trial technology
06/15/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspondence with SZG re formatting exhibit spreadsheet.
06/16/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with NAZ re call with Court re tech.
06/16/2023	Cara E. Greene	CEG	0.2	\$950.00	\$190.00	Correspondence with SZG re Judge Rearden's individual rules for JPTO
06/16/2023	Gregory S. Chiarello	GSC	0.7	\$800.00	\$560.00	Draft Rowe direct examination/review related trial exhibits.
06/16/2023	NY Law Clerk	NYLC	1.8	\$325.00	\$585.00	Research employer control over witnesses.
06/16/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Review correspondence from NAZ and SZG re deposition designations.
06/16/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Run reports of deposition transcripts with designations in TextMap for attorney review
06/16/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Review Judge's rules re hand delivery of boxes to Court in advance of upcoming 6/23/23 submission to Court
06/16/2023	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Correspondence with RRR, SZG, VXY, ALR, and opposing counsel re trial technology meeting with Courtroom Technology Contact.
06/16/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meeting with RRR re trial technology meeting with Courtroom Technology Contact.
06/16/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and compile notes re meeting with RRR re trial technology meeting with Courtroom Technology Contact
06/16/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Review courtroom technology and compile questions for Courtroom Technology Contact in advance of upcoming courtroom technology meeting.
06/16/2023	Napoleon Zapata	NAZ	1.6	\$325.00	\$520.00	Prepare automated Plaintiff and Defendant deposition designations in TextMap for Evren Eryurek, and Kevin Lucas for attorney review.
06/16/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Review Judge's rules re deposition transcripts and additional submissions in jury cases in advance of 6/23/23 submission to Court.
06/16/2023	Shira Gelfand	SZG	3.9	\$425.00	\$1,657.50	Attention to exhibits; call with CEG; correspondence with counsel; begin drafting pre-trial memo of law; call with expert.
06/16/2023	Vincent Yang	VXY	0.4	\$325.00	\$130.00	Correspondences with SZG re exhibits update and review exhibits.
06/16/2023	Vincent Yang	VXY	1.5	\$325.00	\$487.50	Add new exhibits to trial exhibit list and combine exhibits.
06/19/2023	Cara E. Greene	CEG	3.2	\$950.00	\$3,040.00	Prepare witness testimony lists of objectives and review transcripts (2.7); review expert supplemental report and correspondence with SZG re same (.5).
06/19/2023	Shira Gelfand	SZG	5.7	\$425.00	\$2,422.50	Correspondence with expert; correspondence with team; review of report and documents; continue drafting pre-trial MOL and conduct research re same.
06/20/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Prepare for call with court review agenda from NAZ, email to NAZ, review judge's rules, review FV folders, and add myself in Milana.
06/20/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Correspondence with NAZ re call with Court and upcoming deadlines - review case files
06/20/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Coordinate with NAZ and opposing counsel's paralegal re trial technology - review notes from SZG
06/20/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Emails re team meeting and review Trial Prep To Do list.
06/20/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Review multiple emails from team review past correspondence and Trial Prep ToDo list
06/20/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Prepare for Meeting - continue to review past emails and Trial excel
06/20/2023	Abigail L. Robinson	ALR	0.9	\$325.00	\$292.50	Conference with CEG, GSC, SZG, RRR, VXY, and NAZ re Trial Preparation
06/20/2023	Abigail L. Robinson	ALR	0.7	\$325.00	\$227.50	Review updated task list, correspondence with NAZ, draft email to SDNY Technology Department
06/20/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Correspondence with RRR re email to SDNY Technology Department.
06/20/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Send email to SDNY Technology Department re courtroom technology for trial
06/20/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review email with index and updated ToDo List.
06/20/2023	Cara E. Greene	CEG	4.9	\$950.00	\$4,655.00	Prepare for trial planning meeting (.5); trial planning meeting with SZG/GSC (4.3); review and edit correspondence to opposing counsel (.1).
06/20/2023	Gregory S. Chiarello	GSC	5.9	\$800.00	\$4,720.00	Team trial preparation meeting (4.8); draft Rowe direct examination and review related trial exhibits (1.1)
06/20/2023	Jennifer LaMarch	JLM	0.6	\$350.00	\$210.00	Accurant search for local address for Stuart Breslow.
06/20/2023	NY Law Clerk	NYLC	2.1	\$325.00	\$682.50	Research employer control over witness.
06/20/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Review correspondence from NAZ re deposition designations.
06/20/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with SZG, VXY, RRR, TAM, MSY, and ALR re color coding for deposition designations, and text format for manually creating deposition objections.
06/20/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with ALR re questions for upcoming trial technology meeting
06/20/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with RRR re upcoming trial technology meeting, trial prep projects, and deadlines
06/20/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Call with ALR, and opposing counsel's paralegal re trial technology
06/20/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re call with ALR, and opposing counsel's paralegal re trial technology
06/20/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Call with ALR re questions and strategy for upcoming call with opposing counsel's paralegal re trial technology
06/20/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re call with ALR re questions and strategy for upcoming call with opposing counsel's paralegal re trial technology.
06/20/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with SZG, ALR, and VXY re upcoming meeting with attorneys.
06/20/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Follow up correspondence with SZG, VXY, RRR, TAM, MSY, ALR, NCX, and CEG re color coding for deposition designations, and text format for manually creating deposition objections.
06/20/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting with RRR and VXY re upcoming trial prep projects, filevine tasks, and trial playbook
06/20/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare tasks in Filevine for trial prep projects, and coordinate with tasked paralegals
06/20/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Pull opposing counsel paralegal contact information, and update trial playbook
06/20/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Update color coding for deposition designations, and prepare export report of depositions with color coding for attorney review.
06/20/2023	Napoleon Zapata	NAZ	0.9	\$325.00	\$292.50	Meeting with CEG, GSC, ALR, RRR, and SZG re trial prep projects, witness binder and trial exhibit binder updates, and upcoming 6/30/23 submission to court.
06/20/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Review and compile notes re meeting with CEG, GSC, ALR, RRR, and SZG re trial prep projects, witness binder and trial exhibit binder updates, and upcoming 6/30/23 submission to court.
06/20/2023	Naomi Campusano	NCX	0.4	\$350.00	\$140.00	Update designations and correspond with team re same.
06/20/2023	Robert S. Rivera	RRX	0.9	\$350.00	\$315.00	Conference with CEG, GSC, SZG, ALR, VSY and NAZ regarding trial preparation
06/20/2023	Shira Gelfand	SZG	7.1	\$425.00	\$3,017.50	Prep task list and agenda for meeting (.3); team meeting part 1 (1.8); team meeting part two (2.5); draft follow-up task list and circulate (.2); draft correspondence with client, expert, and counsel (.8); correspondence with CEG re pretrial MOL (.2); continue drafting pre-trial MOL (.8); review of compensation documents and correspondence re same (.7).
06/20/2023	Vincent Yang	VXY	0.4	\$325.00	\$130.00	Review correspondences with team and resume exhibit list update.
06/20/2023	Vincent Yang	VXY	0.9	\$325.00	\$292.50	Attend trial preparation meeting with CEG, GC, SZG, NAZ, and RRR re updates and agenda
06/20/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Correspondence with IT re setting up listserv.
06/20/2023	Vincent Yang	VXY	0.8	\$325.00	\$260.00	Finish updating trial exhibits and index.
06/20/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Conference with RRR and NAZ re trial tasks.
06/20/2023	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Add deposition exhibit numbers to exhibit list.
06/21/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review email from SDNY Technology Department.
06/21/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Forward SDNY Technology email to attorneys.
06/21/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review email re court hand delivery.
06/21/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Conference with VXY and NAZ to strategize and assign trial preparation tasks.
06/21/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review assigned tasks on Filevine.
06/21/2023	Abigail L. Robinson	ALR	1.6	\$325.00	\$520.00	Alphabetize witness binders and create new covers and spines for exhibit binders.
06/21/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Conference with RRR re trial technology logistics.

Rowe v. Google LLC
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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
06/21/2023	Cara E. Greene	CEG	3.3	\$950.00	\$3,135.00	Prepare for client prep meeting (.8); trial prep meeting with client (2.5)
06/21/2023	Gregory S. Chiarello	GSC	4.4	\$800.00	\$3,520.00	Review trial tech correspondence (.1); Rowe direct outline and exhibits (1.5); client prep meeting with CEG (2.8)
06/21/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with Rowe litigation paralegals re NAZ July out of office dates
06/21/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with ALR, RRX, VXY, and TAM re trial technology answers from SDNY Trial Tech
06/21/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Prepare tasks in Filevine for trial prep projects, and coordinate with tasked paralegals
06/21/2023	Napoleon Zapata	NAZ	1.4	\$325.00	\$455.00	Prepare Textmap reports of deposition transcripts with designations in advance of manually indicating objections for 6/30/23 submission to the court.
06/21/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Prepare updated draft of trial playbook with updated contact information and project deadline tracker
06/21/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with Transperfect Legal Services re upcoming print request re 6/30/23 submission of trial exhibits and updated joint pretrial order to the Court.
06/21/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meeting with VXY and ALR re breakup of projects for weekly task list, and projects for upcoming 6/30/23 submission to the court.
06/21/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re meeting with VXY and ALR re breakup of projects for weekly task list, and projects for upcoming 6/30/23 submission to the court.
06/21/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with NCX re how to run minuscritp deposition transcript reports using TextMap
06/21/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Call with US Legal re obtaining Kevin Lucas 10/27/20 deposition minuscritp
06/21/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated draft of deposition log.
06/21/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Review deposition transcripts to identify missing minuscritps.
06/21/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Call with NCX re workflow for exporting deposition transcript minuscritp from TextMap
06/21/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare TextMap annotation digest report with all annotations of all transcripts with all depo designations for review.
06/21/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Conference with RRX re preparation of full deposition transcripts with deposition designations and objections for upcoming 6/30/23 submission to court.
06/21/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Prepare deposition transcript minuscritps using TextMap in advance of updating witness binders
06/21/2023	Shira Gelfand	SZG	5.6	\$425.00	\$2,380.00	Continue drafting pre-trial memo; correspondence with counsel; attempt to call court with counsel; correspondence re documents for client review; edit and prepare document for exhibit 113 and call with CEG re same.
06/21/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Review and respond to correspondence re trial technology.
06/21/2023	Vincent Yang	VXY	1.3	\$325.00	\$422.50	Format excel sheet exhibit and organize trial exhibits.
06/21/2023	Vincent Yang	VXY	0.6	\$325.00	\$195.00	Conference with NAZ and AR re trial tasks and agenda.
06/21/2023	Vincent Yang	VXY	0.4	\$325.00	\$130.00	Task NAZ and ALR re trial binder updates and highlighting transcripts with deposition designations; forward binder covers to ALR.
06/21/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Send K. Lucas and E. Eryurek transcripts with designations to CEG for counters.
06/21/2023	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Format excel sheet trial exhibit.
06/22/2023	Abigail L. Robinson	ALR	1.0	\$325.00	\$325.00	Switch out exhibit binder covers and spines.
06/22/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Review update emails from SZG and NAZ.
06/22/2023	Cara E. Greene	CEG	0.9	\$950.00	\$855.00	Deposition cross-designations and correspondence with opposing counsel re same.
06/22/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with RRX re preparation of full deposition transcripts with deposition designations and objections for upcoming 6/30/23 submission to court.
06/22/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meeting with CEG, GSC, ALR, RRX, and SZG re trial prep projects, witness binder and trial exhibit binder updates, and upcoming 6/30/23 submission to court.
06/22/2023	Napoleon Zapata	NAZ	0.9	\$325.00	\$292.50	Assemble and QC updated witness binders in advance of attorney review.
06/22/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with VXY re assembly and QC of witness binders in advance of attorney review.
06/22/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with VXY, RRX, SZG CEG, and GSC re plaintiff and defendant counter designations and objections for Evren Eryurek and Kevin Lucas depositions.
06/22/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Correspondence with SZG re courtesy copy cover letter to include with courtesy copies for 6/30/23 submission to the Court.
06/22/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with RRX re status updates for upcoming 6/30/23 submission to Court.
06/22/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Review and compile notes re meeting with RRX re status updates for upcoming 6/30/23 submission to Court
06/22/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Continue preparing Textmap reports of deposition transcripts with designations in advance of manually indicating objections for 6/30/23 submission to the court.
06/22/2023	Napoleon Zapata	NAZ	0.9	\$325.00	\$292.50	Begin manually indicating objections for 6/30/23 submission to the court
06/22/2023	Shira Gelfand	SZG	5.6	\$425.00	\$2,380.00	Meeting with CEG (.2); review deposition designations and cross designations and transcripts re same (1.3); continue drafting pretrial memo (3.8); call court with counsel and correspondence re same (.3);.
06/22/2023	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Further format Excel trial exhibit.
06/22/2023	Vincent Yang	VXY	0.8	\$325.00	\$260.00	Prepare and tag LitOps team re team task list.
06/22/2023	Vincent Yang	VXY	0.9	\$325.00	\$292.50	Update witness binder indexes to reflect trial exhibit numbers.
06/23/2023	Abigail L. Robinson	ALR	0.8	\$325.00	\$260.00	Review updated task list, draft cover and spine for deposition binder, look for supply list from O'Neill
06/23/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Meeting with NAZ re Ydrive and Filevine database walkthrough, and workflow for preparing trial related documents and binders in advance of upcoming trial prep projects.
06/23/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Create binder index and email binder instructions to HJ.
06/23/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Correspondence with NAZ re binder logistics.
06/23/2023	Abigail L. Robinson	ALR	0.8	\$325.00	\$260.00	Research and request the video of expert Nora Ostrofe deposition.
06/23/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Follow up email with Veritext re requesting video of expert Nora Ostrofe deposition
06/23/2023	Gregory S. Chiarello	GSC	1.4	\$800.00	\$1,120.00	Review matter correspondence (.1); team meeting (1.3).
06/23/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Meeting with ALR re Ydrive and Filevine database walkthrough, and workflow for preparing trial related documents and binders in advance of upcoming trial prep projects.
06/23/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Prepare expert binder for attorney review in advance of upcoming Nora Ostrofe expert deposition
06/23/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with VXY, GAQ, ALR, RRX, and SZG re Nora Ostrofe expert binder
06/23/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with SZG, ALR, and VXY re status updates for 6/20/23 task list
06/23/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare PDF portfolio of stamped plaintiff trial exhibits for attorney review
06/23/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with VXY re trial exhibit list and confirming that the updated Ex. 113 spreadsheet appears on the list.
06/23/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare deposition transcript minuscritps using TextMap in advance of updating witness binders
06/23/2023	Napoleon Zapata	NAZ	1.8	\$325.00	\$585.00	Prepare automated Plaintiff Counter Designations and Defendant Counter Designations in TextMap for Evren Eryurek, and Kevin Lucas for attorney review.
06/23/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Prepare additional automated Plaintiff and Defendant Designations in TextMap for Brian Stevens, and Kevin Lucas for attorney review.
06/23/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated draft of trial playbook with updated contact information and project deadline tracker
06/23/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with RRX, VXY, ALR, NCX, and Veritext re pricing estimates for obtaining synced and unsynced video deposition transcripts for Nora C. Ostrofe's 1/11/23 deposition.
06/23/2023	Shira Gelfand	SZG	4.6	\$425.00	\$1,955.00	Prep agenda and task list for team meeting (.3); team meeting and follow up calendaring (1.0); call with expert (.8); call with CEG (.2); continue drafting pretrial memo (.9); prepare updated exhibit list; edit exhibit P113; and send to Google (.8); Review defendant's updated exhibits and correspondence re witnesses (.6).
06/24/2023	Shira Gelfand	SZG	1.7	\$425.00	\$722.50	Continue drafting pre-trial MOL.
06/26/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review email about new binder and review updated To Do List.
06/26/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Correspondence with NAZ and VXY re updating exhibit 113.

Rowe v. Google LLC
Case No. 19-cv-08655 (JHR)
Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
06/26/2023	Abigail L. Robinson	ALR	0.9	\$325.00	\$292.50	Conference with RRX, NCX, VXY, and NAZ re litigation operations steps to prepare for trial
06/26/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review emails from JLM re subpoena and process trial supply list.
06/26/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review printing instructions emails.
06/26/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review NAZ's email re Veritext.
06/26/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Send email to Trial team with supplies list.
06/26/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Email to NAZ re pulling Orders for the trial binders for court
06/26/2023	Gregory S. Chiarello	GSC	4.4	\$800.00	\$3,520.00	Review client deposition (.9); outline U. Rowe direct examination (2.3); trial prep meeting (.6); conferences with CEG (.5); conference with SZG (.1).
06/26/2023	Hector Jacome	HJ	0.3	\$150.00	\$45.00	Prepared Depo Digest and Transcript Binder for Greg.
06/26/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Review correspondence from NAZ re court submissions.
06/26/2023	Makaria S. Yami	MSY	0.5	\$325.00	\$162.50	Manage Filevine database re removing unnecessary folders.
06/26/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with GSC re preparation of deposition binder
06/26/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Follow up correspondence with SZG, RRX, VXY, ALR, NCX, and Veritext re pricing estimates for obtaining synced and unsynced video deposition transcripts for Nora C. Ostrofe's 1/11/23 deposition.
06/26/2023	Napoleon Zapata	NAZ	0.9	\$325.00	\$292.50	Meeting with ALR, RRX, VXY, and NCX re status updates, task list, and upcoming deadlines.
06/26/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Correspondence with HJ, GSC, and VXY re printing specifications for 6/26/23 binder for GSC containing deposition digests and transcripts.
06/26/2023	Napoleon Zapata	NAZ	1.7	\$325.00	\$552.50	Prepare 6/26/23 binder for GSC containing deposition digests and transcripts for attorney review
06/26/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Review and compile notes re meeting with ALR, RRX, VXY, and NCX re status updates, task list, and upcoming deadlines.
06/26/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with VXY, and ALR re updating plaintiff trial exhibit stamps in Sanction in advance of preparing pdf portfolio of stamped exhibits for attorney review.
06/26/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with RRX re upcoming trial prep projects in advance of upcoming 6/30/23 submission to the Court
06/26/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Call with RRX re upcoming trial prep projects in advance of upcoming 6/30/23 submission to the Court
06/26/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Prepare manuscripts for printing in advance of updating witness binders for attorney review
06/26/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with ALR re pulling Judge Schofield's orders on motions in limine for inclusion in 6/30/23 submission to the Court.
06/26/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with SZG re upcoming exchange of objections and additional deposition designations with opposing counsel.
06/26/2023	Naomi Campusano	NCX	0.8	\$350.00	\$280.00	Attend trial team meeting re case status.
06/26/2023	Naomi Campusano	NCX	0.1	\$350.00	\$35.00	Submit IT request to install CaseMap Suite on SXG computer.
06/26/2023	Naomi Campusano	NCX	0.3	\$350.00	\$105.00	Create CaseMap Suite account for SXG.
06/26/2023	Shira Gelfand	SZG	4.4	\$425.00	\$1,870.00	Prepare and circulate updated task list to team (.4); Call with expert and correspondence with team re same (.5); Call with GSC re matter (.3); continue drafting pre-trial MOL (.4); Prepare FSVL timeline demonstrative outline and review documents re same (2.6); correspondence with client and team re same (.1); correspondence from Rearden chambers re exhibits (.1).
06/26/2023	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Attend to emails and forward task list to RRX.
06/26/2023	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Request witness N. Harteau witness fee check from accounting; confirm approval from attorney re same.
06/26/2023	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Telephone conference with RRX, NAZ, NCX, and ALR re trial task list and agenda
06/26/2023	Vincent Yang	VXY	2.0	\$325.00	\$650.00	Reimport and mark trial exhibits on Sanction to reflect new additions; perform export to case file for review
06/26/2023	Vincent Yang	VXY	1.5	\$325.00	\$487.50	Draft waiver of service of subpoena and finalize subpoena re witness N. Harteau
06/27/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Review docket for Order re MIL and save to file for Binder.
06/27/2023	Abigail L. Robinson	ALR	0.8	\$325.00	\$260.00	Update witness binders with new designation highlights.
06/27/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Update trial binder index with CEG notes.
06/27/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review updated task list email from SZG.
06/27/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Add myself in Pacer Pro, review procedural history and Rule 56.1 statements.
06/27/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review Rule 56.1 statements.
06/27/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review emails and filevine entries on various LitOps tasks.
06/27/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Conference with RRX, VXY, and NAZ.
06/27/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Email to HJ re Fedex label.
06/27/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review meeting agenda.
06/27/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Conference with CEG, GSC, SZG, RRX, VXY, and MAZ re trial preparation tasks
06/27/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with RRX re meeting and Friday filing.
06/27/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with HJ re Fedexing subpoena.
06/27/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review email from VXY with fedex label and subpoena.
06/27/2023	Gregory S. Chiarello	GSC	4.2	\$800.00	\$3,360.00	Case management meeting (1.4); correspondence re expert (.2); Rowe cross outline (.5); draft opening and research strategy re same (1.3); review U. Rowe deposition (.6); conference with CEG (.2).
06/27/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with ALR, RRX, and VXY re updates to witness binders.
06/27/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Conference with RRX, VXY, and ALR re status updates, upcoming trial prep projects, and topics to discuss during meeting with attorneys.
06/27/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Conference with RRX, VXY, SZG, CEG, ALR, and GSC re status updates, deadlines, and trial prep projects pertaining to upcoming 6/30/23 submission to Court.
06/27/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Conference with RRX re last minute plaintiff objections to Kevin Lucas deposition transcript, and upcoming trial prep projects.
06/27/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Review and compile notes re conference with RRX re last minute plaintiff objections to Kevin Lucas deposition transcript, and upcoming trial prep projects.
06/27/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with Transperfect Legal Solutions, HJ, VXY, and RRX re printing and delivery of plaintiff trial exhibit binders.
06/27/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with VXY, ALR, and RRX re status updates re documents to print and submit for 6/30/23 submission to the Court.
06/27/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Begin compiling and preparing documents for 6/30/23 submission to Court
06/27/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with RRX, VXY, and ALR re compiling, and preparing documents for 6/30/23 submission to Court
06/27/2023	Robert S. Rivera	RRX	0.4	\$350.00	\$140.00	Conference with CEG, GSC, ALR, SZG, VXY and NAZ regarding trial preparation tasks
06/27/2023	Shira Gelfand	SZG	6.8	\$425.00	\$2,890.00	Call with expert (.2); correspondence with team re same(.1); attend deposition (3); meeting with team (1.3); call with CEG (.2); attention to binders being sent to court (.3); continue drafting FSVL timeline for demonstrative and send to team (1.7).
06/27/2023	Vincent Yang	VXY	1.9	\$325.00	\$617.50	Resolve trial exhibit issues in Sanction and perform export and stamping of exhibits
06/27/2023	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Attend to correspondences to team re trial tasks; task ALR re reconciling CEG exhibit notes.
06/27/2023	Vincent Yang	VXY	1.4	\$325.00	\$455.00	Prepare and edit exhibit lists to Judge Rearden and for amended joint pretrial order
06/27/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Conference with RRX, NAZ and ALR re trial agenda.
06/27/2023	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Conference with SZG, CEG, GSC, RRX, NAZ, ALR re trial agenda, subpoenas, tech walkthrough, binders
06/27/2023	Vincent Yang	VXY	0.4	\$325.00	\$130.00	Prepare FedEx shipment to N. Harteau attorney re subpoena.
06/27/2023	Vincent Yang	VXY	0.6	\$325.00	\$195.00	Prepare marked exhibits to TLS vendor for binder creation; prepare shipment re same
06/28/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review emails on status of LitOps assignments.
06/28/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	QC the Designations for the Court's copies of the transcripts.
06/28/2023	Abigail L. Robinson	ALR	2.2	\$325.00	\$715.00	QC the Designations for the Court's copies of the transcripts.

Rowe v. Google LLC
Case No. 19-cv-08655 (JHR)
Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
06/28/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	QC the Designations for the Court's copies of the transcripts.
06/28/2023	Gregory S. Chiarello	GSC	0.3	\$800.00	\$240.00	Correspondence with LitOps re Texmap searches (.1); edit client correspondence to Google (.2)
06/28/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Review correspondence from H. Jacome, NAZ re delivering boxes to Court.
06/28/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with HJ re scheduling of courier to deliver boxes for 6/30/23 submission to the Court
06/28/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with HJ re scheduling of courier to deliver boxes for 6/30/23 submission to the Court
06/28/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and compile notes re conference with RRX, VXY, SZG, CEG, ALR, and GSC re status updates, deadlines, and trial prep projects pertaining to upcoming 6/30/23 submission to Court.
06/28/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with ALR, and VXY re in office schedules in advance of upcoming 6/30/23 submission to the Court
06/28/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting with RRX and HJ re delivery of boxes for 6/30/23 submission to Court, QC of plaintiff trial exhibits, upcoming trial prep projects.
06/28/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with JLM, DRI, and AMX re calendaring trial start, pretrial conference dates, per signed order
06/28/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with RRX re reserving Breyer Conference Room in advance of upcoming trial
06/28/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with RRX, HJ, and CC re reserving Breyer Conference Room in advance of upcoming trial
06/28/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with ALR re QC of deposition designations, and objections in advance of printing for 6/30/23 submission to Court.
06/28/2023	Napoleon Zapata	NAZ	2.2	\$325.00	\$715.00	QC stamped plaintiff trial exhibit courtesy copies in advance of upcoming 6/30/23 submission to the Court
06/28/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Update Plaintiff Designations in TextMap for Brian Stevens in advance of upcoming 7/14/23 submission to the Court.
06/28/2023	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Prepare initial draft of courtesy copy cover letter for upcoming 7/14/23 submission to Court
06/28/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with RRX re updates to initial draft of courtesy copy cover letter for upcoming 7/14/23 submission to Court.
06/28/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with RRX, VXY, ALR, SZG, CEG, and GSC re July 2023 OOO dates in advance of trial
06/28/2023	Shira Gelfand	SZG	2.9	\$425.00	\$1,232.50	Correspondence with client and team re correspondence with manager (.4); Begin drafting chart of qualifications for demonstrative and review of documents re same (2.2); review of Court order and correspond with team and counsel re same (.3).
06/28/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Attend to team correspondence re trial agenda.
06/28/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspondence with GSC re Texmap text search function.
06/29/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Email to Attorney trial team re subpoena and transcript follow up
06/29/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Email to opposing counsel paralegal re scheduling tech walkthrough.
06/29/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Draft email to Chambers re technology walk through.
06/29/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Conference with RRX re technology logistics for the Courtroom.
06/29/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Emails with opposing counsel paralegal re scheduling Courtroom technology walk through
06/29/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Draft email to Rowe Trial team re scheduled PTO.
06/29/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Draft email to Chambers re Courtroom Technology walkthrough and send draft to CEG, GSC, and SZG
06/29/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Correspondence with GSC and NAZ re binder assignment.
06/29/2023	Gregory S. Chiarello	GSC	3.8	\$800.00	\$3,040.00	Draft Rowe direct examination outline and cross-examination prep, review exhibits and deposition re same (3.5); review Harteau subpoena (.1); correspondence with lit ops (.2).
06/29/2023	Hector Jacome	HJ	1.0	\$150.00	\$150.00	Prepared 6 sets of Deposition Transcripts with Designations and Objection binders.
06/29/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Follow up correspondence with SZG, VXY, ALR, and CEG re pricing estimates for obtaining synced and unsynced video deposition transcripts for Nora C. Ostrofe's 1/11/23 deposition from Veritext.
06/29/2023	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Prepare deposition transcripts containing designations and objections for printing in advance of 7/14/23 submission to Court.
06/29/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence and meeting with HJ re preparing binders of deposition transcripts containing designations and objections in advance of 7/14/23 submission to Court.
06/29/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Begin preparing stickers for boxes of courtesy copies to submit to Court for upcoming 7/14/23 submission
06/29/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with HJ re preparing stickers for boxes of courtesy copies to submit to Court for upcoming 7/14/23 submission.
06/29/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with RRX, VXY, ALR, SZG, CEG, and GSC re July 2023 OOO dates in advance of trial
06/29/2023	Shira Gelfand	SZG	2.6	\$425.00	\$1,105.00	Call with client and correspondence with team re same (.4); continue reviewing documents and drafting demonstrative (1.8); correspondence with team re deadlines (.2); attention to textmap and Sanction installation for trial (.2).
06/29/2023	Vincent Yang	VXY	1.5	\$325.00	\$487.50	Update witness binder indexes re corresponding trial exhibit numbers.
06/29/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Conference with RRX re trial tech setup.
06/30/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review emails on Lit Ops tasks.
06/30/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Coordinate sending of subpoena.
06/30/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Email to AMW re forth coming email to Chambers. Finalize and send email to Chambers re Courtroom technology walkthrough.
06/30/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review correspondence between opposing counsel and SZG re exchanging objections.
06/30/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Email to SZG re subpoena status.
06/30/2023	Gregory S. Chiarello	GSC	0.0	\$0.00	\$0.00	Berlin Rosen call (.4)(no charge).
06/30/2023	Gregory S. Chiarello	GSC	5.6	\$800.00	\$4,480.00	Rowe direct and cross outlining (1.5); client meeting with CEG (2.7); conference with CEG re trial strategy (1.4)
06/30/2023	Makaria S. Yami	MSY	0.5	\$325.00	\$162.50	Prepare FedEx package re subpoena to witness and correspondence with ALR, VXY re same.
06/30/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Continue preparing stickers for boxes of courtesy copies to submit to Court for upcoming 7/14/23 submission
06/30/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with HJ re preparing stickers for boxes of courtesy copies to submit to Court for upcoming 7/14/23 submission.
06/30/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and organize emails re projects, status updates, and meeting scheduling.
06/30/2023	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Prepare updated draft of trial playbook with updated contacts, and additional O'neill v. Datamir supply list, and box inventory tabs.
06/30/2023	Shira Gelfand	SZG	0.0	\$0.00	\$0.00	Meeting with Berlin Rosen (.4)(no charge).
06/30/2023	Shira Gelfand	SZG	3.2	\$425.00	\$1,360.00	Continue drafting chart of qualifications for demonstrative and review of documents re same (1.3); review of plaintiff's exhibit list and objections re MIL documents (1.6); correspondence with chambers re tech walk through (.1); attention to subpoena for Nic Harteau (.2).
06/30/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Circulate team PTO days to attorneys.
06/30/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Make edits to N. Harteau subpoena.
06/30/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Serve subpoena to N. Harteau attorney via email.
06/30/2023	Vincent Yang	VXY	2.3	\$325.00	\$747.50	Edit GSC U. Rowe witness binder to reflect exhibit correlations; add documents to Nuix casebook
07/03/2023	Gregory S. Chiarello	GSC	4.8	\$800.00	\$3,840.00	Rowe direct outline (4.3); Rowe cross prep outline (.5).
07/05/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Save subpoena delivery confirmation to file.
07/05/2023	Cara E. Greene	CEG	1.1	\$950.00	\$1,045.00	Review and edit timeline demonstrative edits.
07/05/2023	Gregory S. Chiarello	GSC	1.5	\$800.00	\$1,200.00	Edit demonstrative extension letter to court (.1); Rowe direct examination (1.4)
07/05/2023	Jennifer LaMarch	JLM	0.2	\$350.00	\$70.00	File letter motion for ext of time to submit trial exhibits.
07/05/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Prepare binders of deposition transcripts containing designations and objections in advance of 7/14/23 submission to Court.
07/05/2023	Napoleon Zapata	NAZ	1.2	\$325.00	\$390.00	Update binders containing plaintiff's trial exhibits in advance of attorney review
07/05/2023	Shira Gelfand	SZG	0.5	\$425.00	\$212.50	Draft joint letter to court and finalize same.
07/05/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Correspondence with witness attorney re acceptance of subpoena.

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
07/05/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Finalize joint letter for filing.
07/05/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Save conformed documents to case file.
07/05/2023	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Review trial exhibits on Sanction and update.
07/06/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Schedule meeting with RRX.
07/06/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Meet with RRX re trial logistics preparation.
07/06/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Conference with NAZ re designating objections on LUCAS and ERYUREK transcripts.
07/06/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review assignment instructions from NAZ.
07/06/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Correspondence with NAZ re logistics of binder submission to court
07/06/2023	Cara E. Greene	CEG	0.8	\$950.00	\$760.00	Review notes from client prep meeting.
07/06/2023	Gregory S. Chiarello	GSC	3.9	\$800.00	\$3,120.00	Draft Rowe direct examination (3.7); conference with SZG (.2).
07/06/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	QC docket folder.
07/06/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review notes in advance of upcoming exchange with opposing counsel re objections for Kevin Lucas and Evren Eryurek.
07/06/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review notes in advance of meeting with ALR re coverage for upcoming exchange with opposing counsel re objections for Kevin Lucas and Evren Eryurek.
07/06/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting with ALR re adding Kevin Lucas and Evren Eryurek objections to deposition transcripts in advance of upcoming objection exchange and 7/14/23 submission to the Court.
07/06/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with ALR, RRX, TAM, and VXY re adding Kevin Lucas and Evren Eryurek objections to deposition transcripts in advance of upcoming objection exchange and 7/14/23 submission to the Court.
07/06/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with ALR re documents to submit, and upcoming tasks to complete in advance of upcoming 7/14/23 submission to the Court.
07/06/2023	Shira Gelfand	SZG	2.3	\$425.00	\$977.50	Correspondence with team (.2); edit demonstrative (1.7); review court orders re remote witnesses and demonstratives (.2); call with GSC (.2).
07/06/2023	Vincent Yang	VXY	3.2	\$325.00	\$1,040.00	Organize and export updated exhibits and transcripts to trial laptop re Sanction presentation software
07/06/2023	Vincent Yang	VXY	0.6	\$325.00	\$195.00	Conference with RRX re trial presentation software.
07/06/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Update witness binder indexes.
07/07/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review email from NAZ re court submission.
07/07/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with VXY re assignment from SZG.
07/07/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review work product from VXY.
07/07/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Email to Trial Team re courtroom technology walk through
07/07/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review email from SZG re objections and update task in Filevine.
07/07/2023	Cara E. Greene	CEG	0.7	\$950.00	\$665.00	Review objection designations.
07/07/2023	Gregory S. Chiarello	GSC	3.8	\$800.00	\$3,040.00	Draft Rowe direct examination (3.7); team correspondence (.1).
07/07/2023	Makaria S. Yami	MSY	0.2	\$325.00	\$65.00	Save filed documents.
07/07/2023	Shira Gelfand	SZG	1.2	\$425.00	\$510.00	Attention to demonstrative (.9); correspondence with team and counsel (.2); call with GSC (.1)
07/07/2023	Vincent Yang	VXY	0.4	\$325.00	\$130.00	Pull email dates re interviewer documents.
07/07/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Correspondence with RRX and NCX re trial items.
07/09/2023	Cara E. Greene	CEG	2.0	\$950.00	\$1,900.00	Review and edit Rowe direct outline.
07/09/2023	Gregory S. Chiarello	GSC	2.0	\$800.00	\$1,600.00	Draft Rowe direct examination.
07/10/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Email to GSC and VXY re binder location.
07/10/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review updated task list for the week.
07/10/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Reorganize orders in Filevine.
07/10/2023	Abigail L. Robinson	ALR	0.8	\$325.00	\$260.00	Pull and organize exhibits for GSC based on his outline.
07/10/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Send follow up email to Chambers re Courtroom technology walkthrough
07/10/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Correspondence with VXY re file maintenance.
07/10/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Update information in Filevine task.
07/10/2023	Abigail L. Robinson	ALR	1.1	\$325.00	\$357.50	Process and download Nora Ostrofe deposition files from Veritext
07/10/2023	Cara E. Greene	CEG	2.9	\$950.00	\$2,755.00	Finish review and editing Rowe outline draft 1 (.9); correspondence re timeline documents (.1); review Schofield MII orders (.3); review Appendices 1 and 2 for objections to raise with the court and review documents for which there are objections (1.6).
07/10/2023	Gregory S. Chiarello	GSC	4.7	\$800.00	\$3,760.00	Review/incorporation CEG notes re Rowe direct examination (.8); strategy call with CEG (.3); draft Rowe direct examination (3.6).
07/10/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Correspondence with VXY re renaming files.
07/10/2023	Naomi Campusano	NCX	0.4	\$350.00	\$140.00	Meeting with VXY re transcript viewing issues in Sanction.
07/10/2023	Shira Gelfand	SZG	3.3	\$425.00	\$1,402.50	Attention to exhibit list and correspondence re same (1.7); review Mauet trials for direct outline prep (1.0); edit and supplement task list to team (.4); correspondence with Chambers re tech walkthrough (.2).
07/10/2023	Vincent Yang	VXY	2.1	\$325.00	\$682.50	Import pleadings and quality check exhibit stamps and bates stamp excel exhibit.
07/10/2023	Vincent Yang	VXY	0.4	\$325.00	\$130.00	Conference with RRX re agenda items prior to trial.
07/10/2023	Vincent Yang	VXY	0.4	\$325.00	\$130.00	Correspondence with GC, SZG, ALR re various exhibit updates and print jobs.
07/10/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Conference with NCX re troubleshooting Sanction issues.
07/10/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Save N. Ostrofe deposition transcript to case file.
07/11/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Email to attorneys re Courtroom technology walkthrough.
07/11/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Review updates to transcript designations and objections.
07/11/2023	Abigail L. Robinson	ALR	1.6	\$325.00	\$520.00	Review Amended JPTO and determine what edits need to be made to designations and objections.
07/11/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review task list in preparation for team meeting.
07/11/2023	Abigail L. Robinson	ALR	0.7	\$325.00	\$227.50	Conference with CEG, GC, SZG, RRX, and VXY re trial prep, demonstratives, witnesses, objections
07/11/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Email with team about transcripts.
07/11/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Emails with opposing counsel's paralegal and Court technology walkthrough.
07/11/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Follow up email to Chambers re Courtroom technology walkthrough.
07/11/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Coordinate calendar entry of Courtroom technology.
07/11/2023	Abigail L. Robinson	ALR	1.2	\$325.00	\$390.00	Meeting with RRX and VXY on LitOps tasks for Court binder submission and internal binder updates. Organize and send out To Do list.
07/11/2023	Abigail L. Robinson	ALR	2.3	\$325.00	\$747.50	Create deposition transcript designations map, conference re same with RRX and email final product to SZG
07/11/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review email from SZG re deposition designations.
07/11/2023	Cara E. Greene	CEG	4.7	\$950.00	\$4,465.00	Weekly trial team meeting (.7); trial preparation meeting with client and GSC (3.0); meet and confer with opposing counsel re witness order and exhibits (1.0).
07/11/2023	Gregory S. Chiarello	GSC	5.7	\$800.00	\$4,560.00	Draft Rowe direct examination (1.4); team meeting (.7); client meeting with CEG (2.8); call with Paul Hastings, CEG, SZG re JPTO and trial witnesses (.8).
07/11/2023	Naomi Campusano	NCX	0.6	\$350.00	\$210.00	Import deposition video transcript into sanction and correspond with VXY re same
07/11/2023	Robert S. Rivera	RRX	0.7	\$350.00	\$245.00	Conference with CEG, GSC, SZG, ALR and VXY regarding trial preparation, demonstratives, witnesses and objections
07/11/2023	Shira Gelfand	SZG	5.5	\$425.00	\$2,337.50	Circulate updated agenda and task list (.3); edit and supplement JPTO and review Defendant's exhibit list (2); prep for and attend meet and confer (1.2); meeting with CEG re exhibits (.2); correspondence with counsel; correspondence with court; attention to deposition designations and objections (1.8).
07/11/2023	Shira Gelfand	SZG	0.7	\$425.00	\$297.50	Edit and supplement JPTO, send to CEG.
07/11/2023	Vincent Yang	VXY	1.2	\$325.00	\$390.00	Update Defendant's exhibit list and download to file Defendant's new exhibit additions
07/11/2023	Vincent Yang	VXY	0.7	\$325.00	\$227.50	Telephone conference with CEG, GC, SZG, RRX, and ALR re trial prep, demonstratives, witnesses, objections

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
07/11/2023	Vincent Yang	VXY	2.4	\$325.00	\$780.00	Update pretrial order re parties' designations and update various exhibit lists
07/11/2023	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Telephone conference with RRX and ALR re deposition designations and exhibits
07/12/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Review Amended JPTO draft.
07/12/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Correspondence with VXY re next steps.
07/12/2023	Abigail L. Robinson	ALR	0.7	\$325.00	\$227.50	Conference with NAZ re next steps for hard copy submission prep focusing on deposition designations
07/12/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Email to NAZ re cover letter to Court.
07/12/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Review and edit cover letter with binders.
07/12/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Email to HJ re binders.
07/12/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Review updated cover letter to court from NAZ and correspondence with NAZ and VXY
07/12/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Begin to add objections to deposition transcripts.
07/12/2023	Abigail L. Robinson	ALR	2.4	\$325.00	\$780.00	Add objections to the deposition transcripts.
07/12/2023	Cara E. Greene	CEG	3.0	\$950.00	\$2,850.00	Trial testimony prep meeting with client, GSC.
07/12/2023	Cara E. Greene	CEG	1.3	\$950.00	\$1,235.00	Correspondence with trial team re Lucas testimony and stipulation (.2); review and edit JPTO and related exhibits (1.1).
07/12/2023	Gregory S. Chiarello	GSC	3.5	\$800.00	\$2,800.00	Meeting with client, CEG (3.0); team correspondence re trial witnesses (.1); draft Rowe direct examination (.4)
07/12/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Correspondence with VXY re re-naming documents.
07/12/2023	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
07/12/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meetings with RRX re status updates, and projects pertaining to upcoming 7/14/23 submission to the Court
07/12/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Follow up correspondence with HJ re printing stickers to place on boxes to submit to Court for 7/14/23 submission
07/12/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with HJ re reserving courier to pick up and deliver boxes to submit to Court for 7/14/23 submission.
07/12/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Pull Avery labels in advance of printing box stickers for 7/14/23 Court submission
07/12/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with ALR and VXY re status updates and upcoming projects pertaining to 7/14/23 submission to the Court.
07/12/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with ALR re updates to cover letter to submit to Court with document hard copies for upcoming 7/14/23 submission.
07/12/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with HJ re printing and binder assembly assistance in advance of upcoming print request
07/12/2023	Napoleon Zapata	NAZ	1.3	\$325.00	\$422.50	Prepared updated draft of cover letter to submit to Court with document hard copies for 7/14/23 submission for attorney review.
07/12/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Review correspondence and task list of projects to complete for upcoming 7/14/23 submission to Court in advance of conference with ALR re pending tasks.
07/12/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Conference with ALR re pending tasks on task list of projects to complete for upcoming 7/14/23 submission to Court.
07/12/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Prepared updated draft of weekend coverage and Out of Office calendar in advance of circulating to attorneys for review.
07/12/2023	Napoleon Zapata	NAZ	2.1	\$325.00	\$682.50	Update and prepare deposition transcripts containing designations and objections for printing in advance of 7/14/23 submission to Court.
07/12/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review plaintiff exhibit list to determine if excerpts from Ex. 108 appeared in additional exhibits
07/12/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with ALR re review of plaintiff exhibit list to determine if excerpts from Ex. 108 appeared in additional exhibits.
07/12/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with VXY, RRX, and ALR re edits to updated draft of weekend coverage and Out of Office calendar in advance of circulating to attorneys for review.
07/12/2023	Shira Gelfand	SZG	3.4	\$425.00	\$1,445.00	Correspondence with counsel (.2); correspondence with team (.2); edit and supplement demonstrative (1.8); attention to JPTO (1.2).
07/12/2023	Shira Gelfand	SZG	0.8	\$425.00	\$340.00	Correspondence with team (.2); edit and supplement JPTO (.6).
07/12/2023	Vincent Yang	VXY	2.1	\$325.00	\$682.50	Prepare client's document review binder re trial documents.
07/12/2023	Vincent Yang	VXY	2.0	\$325.00	\$650.00	Update annotations and deposition designations on Textmap and export for court submission
07/12/2023	Vincent Yang	VXY	1.2	\$325.00	\$390.00	Conference with RRX re reviewing Sanction presentation software capabilities.
07/12/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Check Vardaman designations re deposition exhibits.
07/12/2023	Vincent Yang	VXY	0.4	\$325.00	\$130.00	Research database re ER notes.
07/12/2023	Vincent Yang	VXY	0.8	\$325.00	\$260.00	Update Sanction exhibit lists and circulate correspondence to team.
07/13/2023	Abigail L. Robinson	ALR	0.9	\$325.00	\$292.50	Meet with NAZ to review and split up tasks for JPTO filing and hard copy submission
07/13/2023	Abigail L. Robinson	ALR	1.0	\$325.00	\$325.00	Update exhibits in exhibit Binders.
07/13/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Update exhibit binder lists.
07/13/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Continue to update the exhibit binders.
07/13/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Continue to update the exhibit binders.
07/13/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Draft JPTO binder covers and coordinate with NAZ.
07/13/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Review and QC timeline spreadsheet.
07/13/2023	Abigail L. Robinson	ALR	1.4	\$325.00	\$455.00	Review and QC timeline spreadsheet.
07/13/2023	Cara E. Greene	CEG	4.9	\$950.00	\$4,655.00	Review and edit pre-trial MOL and conference with SZG re same (1.3); telephone call with GSC re same (.2); prep for meeting re demonstratives (.6); conference with SZG, RS, and RSR re demonstrative timeline (.5); outline closing arguments (2.3).
07/13/2023	Gregory S. Chiarello	GSC	1.3	\$800.00	\$1,040.00	Review Breslow deposition (.9); conference with CEG re trial (.4).
07/13/2023	Hector Jacome	HJ	0.5	\$150.00	\$75.00	Print PDF's to prepare 6 sets of binders.
07/13/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with SZG, CEG, GSC, ALR, RRX, VXY, and TAM re updated paralegal availability calendar
07/13/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
07/13/2023	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Follow up meetings with ALR re pending tasks on task list of projects to complete for upcoming 7/14/23 submission to Court.
07/13/2023	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Finalize and QC deposition transcripts containing designations and objections for printing in advance of 7/14/23 submission to Court.
07/13/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Call and correspondence with HJ re rescheduling courier pick up for 7/17/23
07/13/2023	Napoleon Zapata	NAZ	2.0	\$325.00	\$650.00	Assemble, Finalize, and QC binders containing deposition transcript designations and objections for printing in advance of 7/14/23 submission to Court.
07/13/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes in advance of follow up meetings with ALR re pending tasks on task list of projects to complete for upcoming 7/14/23 submission to Court.
07/13/2023	Napoleon Zapata	NAZ	1.7	\$325.00	\$552.50	Assemble, finalize, and QC binders containing amended joint pretrial order, order on Motions in limine, and joint proposed voir dire questions in advance of upcoming submission to the Court.
07/13/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Review and compile notes re conference with ALR re pending tasks on task list of projects to complete for upcoming 7/14/23 submission to Court.
07/13/2023	Naomi Campusano	NCX	0.1	\$350.00	\$35.00	Circulate trial laptop credentials..
07/13/2023	Shira Gelfand	SZG	7.6	\$425.00	\$3,230.00	Meeting re demonstratives (.5); attention to Friday filing and meeting with CEG re pre-trial MOL and status of filing (1.0); correspondence with paralegals re filing ; continue drafting demonstrative (2.3); edit and draft pre trial MOL (3.8).
07/14/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review updated judge's rules.
07/14/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Conference with Makaria re Filevine maintenance assignment.
07/14/2023	Abigail L. Robinson	ALR	1.5	\$325.00	\$487.50	Review MOL, Appendix B, coordinate emailing Chambers electronic copies of exhibits and list

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
07/14/2023	Abigail L. Robinson	ALR	2.0	\$325.00	\$650.00	Review and format Amended Joint Pretrial Order documents with RRX and NAZ
07/14/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Complete formatting edits to Appendix B of the Amended Joint Pretrial Order
07/14/2023	Abigail L. Robinson	ALR	1.4	\$325.00	\$455.00	Final edits to Amended Joint Pretrial Order for filing. Coordinate and send exhibits to Chambers via email
07/14/2023	Cara E. Greene	CEG	2.1	\$950.00	\$1,995.00	Review, edit, and finalize amended JPTO, pretrial MOL (1.6); telephone calls and correspondence with SZG re same (.5).
07/14/2023	Gregory S. Chiarello	GSC	0.8	\$800.00	\$640.00	Review JPTO issues (.2); review draft MOL (.2); correspondence re JPTO and MOL filings (.2); telephone call with SZG re objections (.2).
07/14/2023	Jennifer LaMarch	JLM	0.4	\$350.00	\$140.00	File proposed pre-trial order and pretrial memorandum
07/14/2023	Makaria S. Yami	MSY	0.2	\$325.00	\$65.00	Conference with ALR re Filevine maintenance assignment.
07/14/2023	Makaria S. Yami	MSY	0.3	\$325.00	\$97.50	Organize case files re orders and opinions.
07/14/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
07/14/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with SZG, ALR, and TAM re updates to CEG trial binder
07/14/2023	Napoleon Zapata	NAZ	1.3	\$325.00	\$422.50	Review docket, and 56.1 documents filed under seal to identify unredacted versions in advance of updating CEG trial binder.
07/14/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Meeting with TAM re review of docket, and 56.1 documents filed under seal to identify unredacted versions in advance of updating CEG trial binder.
07/14/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Review updated local rules in advance of upcoming amended joint pretrial order filing, and submission of courtesy copies to the Court.
07/14/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Correspondence with ALR, and RRX re amended joint pretrial order filing
07/14/2023	Napoleon Zapata	NAZ	2.7	\$325.00	\$877.50	Prepare and finalize documents in advance of filing amended joint pretrial order
07/14/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated binder index in advance of upcoming submission to the Court
07/14/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated draft of cover letter to submit to Court for attorney review in advance of sending with document hard copies for upcoming submission to the Court.
07/14/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Meeting with RRX and ALR re updates to documents, and QC of documents exchanged with opposing counsel in advance of filing amended joint pretrial order.
07/14/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	QC documents in advance of filing amended joint pretrial order, and sending electronic courtesy copies to chambers.
07/14/2023	Shira Gelfand	SZG	11.3	\$425.00	\$4,802.50	Edit and supplement pre-trial MOL (2.2); attention to JPTO filing including exhibit list, exhibits, and other documents, correspond with team, and prepare for filing (9.1).
07/14/2023	Tracee A. Manettas	TAM	0.5	\$350.00	\$175.00	Meeting with NAZ re replacing exhibits to JTPO.
07/15/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with ALR re updates to courtesy copy binders in advance of upcoming submission to the Court
07/16/2023	Gregory S. Chiarello	GSC	0.8	\$800.00	\$640.00	Draft opening (.4); trial organization/planning (.4)
07/17/2023	Abigail L. Robinson	ALR	1.6	\$325.00	\$520.00	Work on construction of hard copy submission binders and coordinate their delivery to Chambers
07/17/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Update materials on thumbdrive being sent to Chambers with hard copy binder submissions
07/17/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Review SZG task list and review SDNY courtroom schedule.
07/17/2023	Abigail L. Robinson	ALR	0.9	\$325.00	\$292.50	Process stamped cover letter from court and work with NAZ re deposition designation QCs.
07/17/2023	Cara E. Greene	CEG	3.5	\$950.00	\$3,325.00	Edit timeline (.4); plan trial schedule (1.3); work on outlines (1.7); correspondence with trial team re jury observation (.1).
07/17/2023	Gregory S. Chiarello	GSC	5.2	\$800.00	\$4,160.00	Rowe direct examination (4.8); conference with CEG (.1); conference with SZG (.3)
07/17/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Review correspondence from ALR, RRX, NAZ re filing.
07/17/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Save Memorandum of Law and JPTO to case files.
07/17/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Correspondence with ALR re organizing case files.
07/17/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with RRX and TAM re NAZ weekly availability from 7/17/23 - 7/21/23
07/17/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Correspondence with RRX and SZG re updates to cover letter to submit with Court courtesy copies
07/17/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review judge's rules in advance of updating cover letter to submit with Court courtesy copies.
07/17/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting with ALR re final updates to courtesy copy binders in advance of submitting to court
07/17/2023	Napoleon Zapata	NAZ	1.3	\$325.00	\$422.50	Finalize binders containing courtesy copies in advance of submitting to the Court
07/17/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Perform final QC of updated binders and USB containing electronic documents in advance of submitting courtesy copies to the Court.
07/17/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Update internal binders of documents submitted to the Court in advance of attorney review
07/17/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review CEG trial binder in advance of updating, per CEG request
07/17/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Follow up correspondence with SZG re updates to CEG trial binder
07/17/2023	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Prepare documents containing all Evren Eryurek deposition designation page and lines, and pages of designated text for attorney review.
07/17/2023	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Compare Evren Eryurek deposition designations and objections in deposition transcript submitted to the court to filed amended joint pretrial order to identify potential errors.
07/17/2023	Napoleon Zapata	NAZ	0.9	\$325.00	\$292.50	Meetings with RRX and ALR re errors found in comparison of Evren Eryurek deposition designations and objections in deposition transcript submitted to the court to filed amended joint pretrial order.
07/17/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Correspondence with RRX and ALR re errors found in comparison of Evren Eryurek deposition designations and objections in deposition transcript submitted to the court to filed amended joint pretrial order.
07/17/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Enter and update drafts of daily time narratives in Filevine
07/17/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
07/17/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meetings with ALR and HJ re preparation of boxes containing courtesy copy binders to submit to Court
07/17/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated task list of upcoming trial prep projects and deadlines.
07/17/2023	Shira Gelfand	SZG	6.7	\$425.00	\$2,847.50	Call with GSC (.3); draft agenda and task list for team (.3); research EPL trial in SDNY, correspondence re same (1.8); draft proposed limiting instruction for motions in limine (1.6); begin research and drafting memo re business record exception (2.6).
07/18/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Conference with RRX re LitOps Assignments.
07/18/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Conference with NAZ re LitOps Assignments.
07/18/2023	Abigail L. Robinson	ALR	2.7	\$325.00	\$877.50	Update Plaintiff Exhibit Index re witnesses.
07/18/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review exhibit index and appendix A of JPTO.
07/18/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Conference with RRX re updates to Indexes.
07/18/2023	Abigail L. Robinson	ALR	0.7	\$325.00	\$227.50	Update Plaintiff Exhibit index re adding columns and providing formatting options
07/18/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Begin to re-order Plaintiff's exhibit 104 per GSC's request.
07/18/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Coordinate tasks for the delivery of Plaintiff exhibits binder to opposing counsel
07/18/2023	Abigail L. Robinson	ALR	1.4	\$325.00	\$455.00	Re-order Plaintiff's exhibit 104 per GSC's request.
07/18/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Create witness indexes.
07/18/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Email to SZG re uploading link from Chambers.
07/18/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Follow up email to SZG re uploading link from Chambers
07/18/2023	Cara E. Greene	CEG	5.2	\$950.00	\$4,940.00	Trial planning and witness prep (4.3); conference with GSC re trial planning (.5); plan moot trial (.4)
07/18/2023	Gregory S. Chiarello	GSC	7.0	\$800.00	\$5,600.00	Observe SDNY EPA trial (.8); trial preparation correspondence (.4); Rowe direct examination outline (2.8); trial team meeting (1.5); meetings with CEG (.7); review M. Lawrence exhibits for trial (.8).
07/18/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Update case files.
07/18/2023	Makaria S. Yami	MSY	0.8	\$325.00	\$260.00	Rename orders and opinion files and delete duplicate files
07/18/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with ALR re QC of deposition transcripts with designations and objections, and updates to designation and objection map.

Rowe v. Google LLC
Case No. 19-cv-08655 (JHR)
Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
07/18/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
07/18/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Pull and organize defendant exhibits and exhibit list sent to the court in advance of attorney review
07/18/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with RRX, SZG, and ALR re pulling, and organizing defendant exhibits and exhibit list sent to the court in advance of attorney review.
07/18/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting with ALR re upcoming projects and trial prep deadlines.
07/18/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting with ALR, and HJ re planning of logistics of sending opposing counsel physical binders of plaintiff trial exhibits.
07/18/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with ALR, SZG, HJ, and RRX re planning of logistics of sending opposing counsel physical binders of plaintiff trial exhibits.
07/18/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meetings with ALR re updates to CEG trial binder.
07/18/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Meetings with ALR re updates to plaintiff trial exhibit list, QC of witnesses associated with plaintiff exhibits, and preparation of cover letter for plaintiff exhibits to deliver to opposing counsel.
07/18/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with SZG re errors in deposition designations and objections in amended joint pretrial order, and deposition transcripts submitted to the court.
07/18/2023	Napoleon Zapata	NAZ	0.9	\$325.00	\$292.50	Update and QC list of deposition designations and objections in advance of attorney review
07/18/2023	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Compare Stuart Vardaman deposition designations and objections in deposition transcript submitted to the court to filed amended joint pretrial order to identify potential errors.
07/18/2023	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Compare Kevin Lucas deposition designations and objections in deposition transcript submitted to the court to filed amended joint pretrial order to identify potential errors.
07/18/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meeting with RRX re QC of Kevin Lucas deposition designations and objections, and errors in amended joint pretrial order.
07/18/2023	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	QC of list of witnesses associated with plaintiff trial exhibits.
07/18/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with ALR re QC of list of witnesses associated with plaintiff trial exhibits
07/18/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with CEG and RRX re Evren Eryurek deposition designations, and errors in designations and objections.
07/18/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Prepare updated task list of upcoming trial prep projects and deadlines.
07/18/2023	Susan E. Huhta	SEH	0.3	\$850.00	\$255.00	Emails to and from CEG and S Gelfand re mock cross exam.
07/18/2023	Shira Gelfand	SZG	6.3	\$425.00	\$2,677.50	Circulate agenda for team meeting (.2); attend team meeting (1.5); review correspondence re Nic Harteau, compile communications and draft privilege log (2.0); continue drafting memo re business record exception (1.8); edit demonstratives (1).
07/19/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Q/C exhibit 104 in chronological order.
07/19/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with NAZ re upcoming assignments.
07/19/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review emails and correspondence with NAZ re assignments.
07/19/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Conference with NAZ re witness binders.
07/19/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Correspondences with RRX and NAZ re assignment delegation, meeting scheduling, and reviewing trial playbook
07/19/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review depo designations.
07/19/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Review exhibits for trial witnesses.
07/19/2023	Abigail L. Robinson	ALR	1.0	\$325.00	\$325.00	Send JPTO submission files to Chambers via link.
07/19/2023	Cara E. Greene	CEG	8.7	\$950.00	\$8,265.00	Mock trial planning (.8); draft demonstratives (1.9); review expert report and work on outline (1.6); plan witness order and correspondence with opposing counsel re same (.7); review trial documents (.7); examination prep meeting with client (3.0).
07/19/2023	Gregory S. Chiarello	GSC	6.5	\$800.00	\$5,200.00	Trial preparation correspondence (.4); trial witness outlining (2.2); meeting with client, CEG (3.5); conference with CEG (.4).
07/19/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
07/19/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with ALR and RRX re status updates, and workflow for updating witness binders with exhibits to use for each witness from plaintiff and defendant exhibits.
07/19/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare pdf portfolio of defendant stamped exhibits for attorney review
07/19/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with ALR, RRX, and GSC re preparation of pdf portfolio of defendant stamped exhibits for attorney review.
07/19/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Prepare initial draft of cover letter to send to opposing counsel with plaintiff trial exhibit binders
07/19/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with TLS re upcoming print request to print documents to update witness binders
07/19/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review documents used to create initial draft of witness binders in advance of updating witness binders
07/19/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meeting with ALR re status updates, and workflow for updating witness binders with exhibits to use for each witness from plaintiff and defendant exhibits.
07/19/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and compile notes re meeting with ALR re status updates, and workflow for updating witness binders with exhibits to use for each witness from plaintiff and defendant exhibits.
07/19/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review notes in advance of meeting with ALR re status updates, and workflow for updating witness binders with exhibits to use for each witness from plaintiff and defendant exhibits.
07/19/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Review documents included within initial drafts of witness binders to identify deposition digests for all deposed witnesses.
07/19/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Review documents included within initial drafts of witness binders to identify deposition transcripts to replace with transcripts containing designations.
07/19/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Run Nuix searches to identify and pull documents from 11/14/23 - 11/16/23 that reference a meeting with Diane Green.
07/19/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with RRX, ALR, and NCX re running Nuix searches to identify and pull documents from 11/14/23 - 11/16/23 that reference a meeting with Diane Green.
07/19/2023	Naomi Campusano	NCX	0.1	\$350.00	\$35.00	Correspond with RRX re Nuix trial casebook.
07/19/2023	Susan E. Huhta	SEH	0.2	\$850.00	\$170.00	Emails to and from CEG, GC and S. Gelfand re next steps and file review.
07/19/2023	Shira Gelfand	SZG	6.4	\$425.00	\$2,720.00	Draft Ben Wilson witness outline (3.7); correspondence with team re cross exam mock (.2); meeting with CEG re damages demonstrative (.2); draft demonstrative (1.8); correspondence with paralegals re binder delivery (.2); update agenda for team (.1); correspondence with counsel re witness order (.2).
07/20/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Coordinate delivery of binders to opposing counsel.
07/20/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Update witness binders.
07/20/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Finalize cover letter and binders to be delivered to opposing counsel
07/20/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Continue to update witness binders.
07/20/2023	Abigail L. Robinson	ALR	1.7	\$325.00	\$552.50	Updates to witness binders and exhibit indexes.
07/20/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Update witness binders.
07/20/2023	Abigail L. Robinson	ALR	1.3	\$325.00	\$422.50	Update witness binders.
07/20/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Conference with RRX re witness binders and exhibit indexes.
07/20/2023	Abigail L. Robinson	ALR	1.3	\$325.00	\$422.50	Updates to witness binders and exhibit index.
07/20/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Email with SZG re upload to Chambers.
07/20/2023	Cara E. Greene	CEG	4.9	\$950.00	\$4,655.00	Conference with GSC re review exhibits (4.0); review and edit demonstrative timeline and correspondence re same (.9).
07/20/2023	Gregory S. Chiarello	GSC	8.5	\$800.00	\$6,800.00	Trial preparation correspondence, Rowe binder compilation, and conferences with Lit Ops re same (1.3); draft Rowe cross examination outline (1.0); draft Row direct examination outline (.7); edits to demonstratives (1.1); trial strategy and planning meeting with CEG (2.5); review exhibits with CEG and assign witnesses (1.9).

Rowe v. Google LLC
Case No. 19-cv-08655 (JHR)
Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
07/20/2023	Makaria S. Yami	MSY	0.3	\$325.00	\$97.50	Rename case files re Motions In Limine.
07/20/2023	Naomi Campusano	NCX	0.4	\$350.00	\$140.00	Attend team meeting re trial prep updates.
07/20/2023	Shira Gelfand	SZG	6.8	\$425.00	\$2,890.00	Calls with Ken Gage and court (.3); attention to binder delivery to Paul Hastings (.2); review of exhibits and Vardaman testimony (2.2); calls with CEG re same (.2); drafting and editing demonstratives and correspondence re same (1.8); continue drafting direct examination outline for Ben Wilson (2.1);.
07/21/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review emails on filing of demonstrative.
07/21/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Correspondence with Jlm and NAZ re demonstratives, review docket and judges rules re submission of demonstrative.
07/21/2023	Abigail L. Robinson	ALR	0.8	\$325.00	\$260.00	Conference with NAZ re next steps on index and demonstratives.
07/21/2023	Abigail L. Robinson	ALR	4.0	\$325.00	\$1,300.00	Update exhibit index.
07/21/2023	Abigail L. Robinson	ALR	0.9	\$325.00	\$292.50	Process Defendants' demonstrative, correspondence with NAZ re our demonstrative, and updates to the exhibit index.
07/21/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Finalize demonstrative.
07/21/2023	Cara E. Greene	CEG	2.4	\$950.00	\$2,280.00	Finalize demonstrative exhibits and coordinate weekend trial work.
07/21/2023	Gregory S. Chiarello	GSC	7.4	\$800.00	\$5,920.00	Draft Rowe direct and cross outlines (2.5); conferences with CEG re demonstratives (1.0); team correspondence (.1); conference with CEG, SZG (.7); edit demonstratives (3.1).
07/21/2023	Napoleon Zapata	NAZ	0.9	\$325.00	\$292.50	Meetings with AMX, and TAM re demonstratives, status updates, and logistics for sending printed set and USB of demonstratives to the court to the court.
07/21/2023	Napoleon Zapata	NAZ	1.3	\$325.00	\$422.50	Prepare initial draft of cover letter to send with submission of trial demonstratives to the Court for attorney review
07/21/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Calls with Breakaway to schedule courier pick up and delivery of box containing printed hard copies and USB of trial demonstratives to the Court.
07/21/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with CC, TAM, RRR, and ALR re logistics for courier pick up of boxes containing trial demonstratives and delivery to the Court.
07/21/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review emails in advance of initial conference with ALR re pending trial prep projects, upcoming deadlines, and workflow for completing projects.
07/21/2023	Napoleon Zapata	NAZ	0.9	\$325.00	\$292.50	Initial conference with ALR re pending trial prep projects, upcoming deadlines, and workflow for completing projects.
07/21/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and compile notes re initial conference with ALR re pending trial prep projects, upcoming deadlines, and workflow for completing projects.
07/21/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Follow up conference with ALR re pending trial prep projects, upcoming deadlines, and workflow for completing projects.
07/21/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Call and correspondence with RRR re edits to trial demonstratives, and logistics for courier pick up of boxes containing trial demonstratives and delivery to the Court.
07/21/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with Docket Admins re calendaring upcoming joint pretrial conference
07/21/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Begin review of plaintiff and defendant exhibit lists to determine which exhibits have been used by both parties, and which ones have only been used by one party.
07/21/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Follow up correspondence with ALR re transmission of demonstratives to Court, status updates, and possible weekend work.
07/21/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
07/21/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with DL re possible 7/24/23 delivery of boxes containing trial demonstratives to opposing counsel
07/21/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Enter and update drafts of daily time narratives in Filevine
07/21/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with SZG re updates to demonstrative cover letter draft, and logistics for upcoming delivery to Court.
07/21/2023	Naomi Campusano	NCX	0.8	\$350.00	\$280.00	Meeting with ALR re creating document report in Nuix.
07/21/2023	Shira Gelfand	SZG	7.3	\$425.00	\$3,102.50	Draft and edit demonstratives (3.4); calls with team (.3); correspondence with court (.1); drafting opening statement exhibit references (1.8); Ben Wilson direct outline (1.2); call with CEG (.2); call with expert (.1); call with opposing counsel (.2).
07/22/2023	Shira Gelfand	SZG	2.0	\$425.00	\$850.00	Attend to delivery of Def's trial exhibits.
07/23/2023	Cara E. Greene	CEG	6.3	\$950.00	\$5,985.00	Conference with GSC re moot trial planning, witness exams, client exam prep, and exhibit review
07/23/2023	Gregory S. Chiarello	GSC	6.8	\$800.00	\$5,440.00	Draft opening statement (.5); review defendant's exhibits with CEG (4.0); trial strategy meeting with CEG (2.3).
07/23/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with CEG, SZG, RRR, ALR, and VXY re upcoming 10:30am in person meeting to discuss upcoming trial prep projects.
07/23/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review plaintiff trial exhibit list, and plaintiff exhibits to identify the cause of inconsistencies in plaintiff exhibit bates numbering.
07/23/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Call with CEG re status and location of deduplicated joint trial exhibit list in advance of attorney review
07/23/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with RRR re status and location of deduplicated joint trial exhibit list in advance of attorney review
07/23/2023	Shira Gelfand	SZG	5.8	\$425.00	\$2,465.00	Correspondence with team (.2); review SDNY schedule for the week (.1); edit and draft comprehensive timeline (5.5).
07/24/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review and circulate SDNY Courtroom Proceedings Calendar.
07/24/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Save and organize documents to Filevine.
07/24/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review email re demonstratives.
07/24/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Conference with NAZ re LitOp task list. Email task list to RRR.
07/24/2023	Abigail L. Robinson	ALR	1.5	\$325.00	\$487.50	Conference with CEG, GSC, SZG, RRR, VXY, and NAZ.
07/24/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Conference with attorney re change in trial schedule.
07/24/2023	Abigail L. Robinson	ALR	3.0	\$325.00	\$975.00	Updates to Exhibits Index.
07/24/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Update LitOps ToDo List and coordinate LitOps meeting.
07/24/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review notes from call with Chambers and Minute Entry.
07/24/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Email to O/C Paralegal re courtroom walkthrough.
07/24/2023	Abigail L. Robinson	ALR	0.9	\$325.00	\$292.50	Prep for and attend LitOps meeting with RRR, VXY, and NAZ to discuss assignment list.
07/24/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Email to SZG re ordering transcript.
07/24/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Email to Opposing Counsel's paralegal re ordering transcript and splitting the cost
07/24/2023	Cara E. Greene	CEG	2.6	\$950.00	\$2,470.00	Trial team meeting with lit ops (1.2); conference with GSC, SZG re trial tactics and strategy (.6); conference with the court (.3); conference with team re rescheduled trial, notify witnesses (.5).
07/24/2023	Gregory S. Chiarello	GSC	3.2	\$800.00	\$2,560.00	Rowe direct examination (.8); team meeting with paralegals (for part) (2.1); telephone court conference (.3)
07/24/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Save and re-name order.
07/24/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Save and rename docket entry.
07/24/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare final draft of cover letter to include with submission of demonstratives to the court
07/24/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
07/24/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Prepare updated task list of upcoming trial prep projects and deadlines.
07/24/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meeting with CC re letter containing plaintiff trial demonstratives for courier to pick up and deliver to chambers
07/24/2023	Napoleon Zapata	NAZ	1.5	\$325.00	\$487.50	Initial meeting with SZG, GSC, CEG, RRR, VXY, and ALR re witness binder updates, updates to primary exhibit list, trial tech demo, and upcoming trial prep projects.
07/24/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Follow up meeting with SZG, GSC, CEG, RRR, VXY, and ALR re witness binder updates, updates to primary exhibit list, trial tech demo, and upcoming trial prep projects.
07/24/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with RRR re status updates, edits to witness binders, and upcoming trial prep projects.

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
07/24/2023	Napoleon Zapata	NAZ	3.8	\$325.00	\$1,235.00	Scan and prepare updated draft of primary combined index with attorney notes re witness exhibits, and additional edits.
07/24/2023	Napoleon Zapata	NAZ	1.2	\$325.00	\$390.00	Prepare printed courtesy copies of plaintiff trial demonstratives for submission to the Court
07/24/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Scan cover letter included with hard copies of plaintiff trial exhibits submitted to the Court
07/24/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with SZG, CEG, and GSC confirming submission of hard copies of plaintiff trial exhibits submitted to the Court.
07/24/2023	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Meeting with RRX, VXY, and ALR re witness binder updates, updates to primary exhibit list, trial tech demo, and upcoming trial prep projects.
07/24/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and compile notes re meeting with RRX, VXY, and ALR re witness binder updates, updates to primary exhibit list, trial tech demo, and upcoming trial prep projects.
07/24/2023	Robert S. Rivera	RRX	1.5	\$350.00	\$525.00	Conference with CEG, GSC, SZG, ALR, VXY and NAZ regarding trial preparation
07/24/2023	Shira Gelfand	SZG	5.3	\$425.00	\$2,252.50	Continue drafting comprehensive timeline (1.7); draft agenda for team (.3); team meeting re trial (1.2); call with court (.3); meeting with CEG and GSC re trial tactics (.6); call with client (.2); draft leveling feedback document (1.2).
07/24/2023	Vincent Yang	VXY	1.5	\$325.00	\$487.50	Conference with CEG, GC, SZG, RRX, NAZ, and ALR re witness and trial binders, trial tech, examinations, and etc
07/24/2023	Vincent Yang	VXY	0.4	\$325.00	\$130.00	Confer with ALR and NAZ re witness binder updates.
07/24/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Conference with CEG, GC, SZG, RRX, NAZ, and ALR re update trial timeline
07/24/2023	Vincent Yang	VXY	3.0	\$325.00	\$975.00	Update primary exhibit list re duplicate marked exhibits and deposition exhibit overlaps
07/24/2023	Vincent Yang	VXY	0.4	\$325.00	\$130.00	Conference with ALR, RRX, and NAZ re pending trial tasks.
07/25/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Review and update Trial Exhibit Index.
07/25/2023	Abigail L. Robinson	ALR	2.0	\$325.00	\$650.00	Attend Technology walkthrough at the Southern District of New York with CEG, GSC, SZG, VXY, and NAZ
07/25/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Order transcript from SDNY court reporters.
07/25/2023	Abigail L. Robinson	ALR	2.6	\$325.00	\$845.00	Coordinate and assemble the electronic documents needed for witness binders. Update trial exhibit index in the process.
07/25/2023	Abigail L. Robinson	ALR	7.7	\$325.00	\$2,502.50	Coordinate and assemble the electronic documents needed for witness binders. Update trial exhibit index in the process.
07/25/2023	Cara E. Greene	CEG	1.1	\$475.00	\$522.50	Travel to and from court.
07/25/2023	Cara E. Greene	CEG	0.6	\$950.00	\$570.00	Visit courtroom and meet with technologist.
07/25/2023	Cara E. Greene	CEG	1.8	\$950.00	\$1,710.00	Conference with GSC re trial planning in light of postponement of trial
07/25/2023	Gregory S. Chiarello	GSC	1.6	\$800.00	\$1,280.00	Meet with CEG re revised trial prep strategy and schedule (1.0); conference with CEG (.3); organize next pre steps (.3).
07/25/2023	Gregory S. Chiarello	GSC	1.0	\$400.00	\$400.00	Tech walk through and travel to court.
07/25/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Save Order to case files.
07/25/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
07/25/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated task list of upcoming trial prep projects and deadlines.
07/25/2023	Napoleon Zapata	NAZ	2.0	\$325.00	\$650.00	Attend trial technology walkthrough with trial technician at courtroom in advance of upcoming trial,
07/25/2023	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Review deposition index in advance of preparing updated draft.
07/25/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Prepare updated draft of deposition index.
07/25/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting with DL re hard copies of sealed official deposition transcripts
07/25/2023	Napoleon Zapata	NAZ	1.5	\$325.00	\$487.50	Begin preparing binder tabs for witness binders in advance of binder assembly
07/25/2023	Napoleon Zapata	NAZ	1.2	\$325.00	\$390.00	Follow up meetings with RRX, ALR and VXY re workflow for preparation and assembly of witness binders
07/25/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Review and compile notes re meeting with ALR and VXY re workflow for preparation and assembly of witness binder.
07/25/2023	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Prepare and assemble witness binder spines and covers.
07/25/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Initial meeting with RRX and ALR re witness binders and upcoming trial prep projects
07/25/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Review produced documents from 11/14/23 - 11/16/23 to identify communications re Ulku Rowe's meeting with Diane Greene.
07/25/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with NCX re review produced documents from 11/14/23 - 11/16/23 to identify communications re Ulku Rowe's meeting with Diane Greene.
07/25/2023	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Begin preparing initial draft of master index of files and file locations in advance of circulating to attorneys
07/25/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Begin compiling files to use for trial case book in advance of creating trial casebook
07/25/2023	Naomi Campusano	NCX	1.8	\$350.00	\$630.00	Conduct document review in Nuix and correspond with NXZ re same.
07/25/2023	Naomi Campusano	NCX	0.7	\$350.00	\$245.00	Create Nuix trial casebook.
07/25/2023	Susan E. Huhta	SEH	0.1	\$850.00	\$85.00	Texts to and from S. Gelfand re postponement; email from CEG re same.
07/25/2023	Shira Gelfand	SZG	1.2	\$212.50	\$255.00	Travel to and attend tech walkthrough.
07/25/2023	Shira Gelfand	SZG	4.0	\$425.00	\$1,700.00	Correspondence with client (.2); review Defendant's demonstratives for factual accuracy (1.8); meeting with CEG to discuss same (.2); draft memo re leveling feedback for L8 and 9 TDs (1.8).
07/25/2023	Vincent Yang	VXY	1.2	\$325.00	\$390.00	Attend technology walkthrough for SDNY courthouse re trial equipment and setup
07/25/2023	Vincent Yang	VXY	5.0	\$325.00	\$1,625.00	Prepare witness binder indexes re exhibits for each witness.
07/25/2023	Vincent Yang	VXY	3.0	\$325.00	\$975.00	Assemble witness W. Grannis binder and exhibits and transcripts.
07/25/2023	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Conferences and correspondences with NAZ and ALR re witness binder project.
07/26/2023	Abigail L. Robinson	ALR	1.3	\$325.00	\$422.50	Review and update trial exhibit index.
07/26/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Update internal PTO calendar.
07/26/2023	Abigail L. Robinson	ALR	1.6	\$325.00	\$520.00	Create slip sheets for Shaukat witness binder.
07/26/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Update Trial Exhibit Index.
07/26/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Conference with VXY on next steps in witness binder assignments.
07/26/2023	Cara E. Greene	CEG	0.3	\$950.00	\$285.00	Correspondence re adjusted trial date and correspondence to court re final pretrial hearing
07/26/2023	Gregory S. Chiarello	GSC	1.2	\$800.00	\$960.00	Correspondence with client (.1); trial strategy/planning/admin (.7); review Mauet on cross (.4)
07/26/2023	Jennifer LaMarch	JLM	0.3	\$350.00	\$105.00	Update trial calendar.
07/26/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Correspondence with ALR re reissued order and saving documents.
07/26/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Save reissued order.
07/26/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
07/26/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated task list of upcoming trial prep projects and deadlines.
07/26/2023	Napoleon Zapata	NAZ	7.1	\$325.00	\$2,307.50	Prepare Tariq Shaukat witness binder in advance of attorney review and analysis.
07/26/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meeting with ALR, VXY, and RRX re workflow for preparing witness binders
07/26/2023	Shira Gelfand	SZG	1.1	\$425.00	\$467.50	Correspondence with court (.2); attention to witness binders (.2); review court order (.1); review correspondence with expert and documents re def's demonstrative (.6).
07/26/2023	Vincent Yang	VXY	0.0	\$0.00	\$0.00	Attend to emails re ongoing projects.
07/26/2023	Vincent Yang	VXY	0.4	\$325.00	\$130.00	Conference with NAZ, ALR, RRX re witness binder project.
07/26/2023	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Finish W. Grannis witness binder re exhibits.
07/26/2023	Vincent Yang	VXY	4.5	\$325.00	\$1,462.50	Prepare witness binder indexes and reconcile exhibits.
07/27/2023	Gregory S. Chiarello	GSC	3.4	\$800.00	\$2,720.00	Review Eryurek deposition (1.4); review Wilson deposition (1.6); review Hareau declaration (.1); notes for Rowe direct (.3).
07/27/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Update paralegal availability calendar with updated PTO.
07/27/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with SZG re stamped defendant's trial exhibits, and updates to Stuart Vardaman deposition designations.

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
07/27/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Continue review produced documents from 11/14/23 - 11/16/23 to identify communications re Ulku Rowe's meeting with Diane Greene.
07/27/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with CEG and NCX re review of produced documents from 11/14/23 - 11/16/23 to identify communications re Ulku Rowe's meeting with Diane Greene.
07/27/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated draft of deposition log.
07/27/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Continue compiling files to use for trial case book in advance of creating trial casebook in Nuix
07/27/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with NCX and RRX re compiling files to use for trial case book in advance of creating trial casebook
07/27/2023	Napoleon Zapata	NAZ	1.5	\$325.00	\$487.50	Prepare initial draft of tracker of deposition witness declarations
07/27/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Continue updating paralegal availability calendar with updated PTO.
07/27/2023	Naomi Campusano	NCX	0.7	\$350.00	\$245.00	Create CaseMap suite account for GXC and correspond with him re same.
07/27/2023	Shira Gelfand	SZG	0.6	\$425.00	\$255.00	Correspondence with team (.1); compile feedback from Dave Rensin to L8 and L9 Technical directors (.5)
07/27/2023	Vincent Yang	VXY	3.9	\$325.00	\$1,267.50	Update master index re trial exhibits and witness associations.
07/28/2023	Gregory S. Chiarello	GSC	2.4	\$800.00	\$1,920.00	Draft Rowe direct examination (2.1); textmap installation (.3).
07/28/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated task list of upcoming trial prep projects and deadlines.
07/28/2023	Naomi Campusano	NCX	2.8	\$350.00	\$980.00	Ingest client document for trial casebook.
07/28/2023	Susan E. Huhta	SEH	0.1	\$850.00	\$85.00	Emails to and from CEG re trial postponement and new date for mock cross exam
07/28/2023	Vincent Yang	VXY	2.6	\$325.00	\$845.00	Finish updating master index re witness exhibits.
07/28/2023	Vincent Yang	VXY	3.8	\$325.00	\$1,235.00	Further prepare witness binder indexes.
07/31/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Process and file court transcript and invoice.
07/31/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Correspondence with RRX, VXY, and NAZ re binder assignment status.
07/31/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Review and update electronic witness trial binders.
07/31/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Conference with RRX, VXY, and NAZ re witness binders.
07/31/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Conference with VXY re details of preparing binder slip sheets for printer
07/31/2023	Abigail L. Robinson	ALR	2.2	\$325.00	\$715.00	Create slip sheets for Rowe and Lawrence witness binders.
07/31/2023	Gregory S. Chiarello	GSC	2.9	\$800.00	\$2,320.00	Rowe direct examination and review of PX104, 126 re same (2.6); conference with NZ re textmap functionality (.3)
07/31/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
07/31/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meeting with GSC re demo of TextMap Rowe v. Google database and functionality in advance of attorney use during upcoming trial.
07/31/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with GSC, RRX, VXY, and ALR re meeting to demo TextMap Rowe v. Google database and functionality in advance of attorney use during upcoming trial, and TextMap tasks.
07/31/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Meeting with ALR, VXY, and RRX witness binder status updates, and upcoming trial prep projects
07/31/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re meeting with GSC re demo of TextMap Rowe v. Google database and functionality in advance of attorney use during upcoming trial.
07/31/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Review task list in advance of meeting with ALR, VXY, and RRX witness binder status updates, and upcoming trial prep projects.
07/31/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated task list of upcoming trial prep projects and deadlines.
07/31/2023	Naomi Campusano	NCX	1.8	\$350.00	\$630.00	Ingest transcripts into trial casebook in Nuix.
07/31/2023	Vincent Yang	VXY	5.0	\$325.00	\$1,625.00	Further update electronic witness binders and indexes.
07/31/2023	Vincent Yang	VXY	0.7	\$325.00	\$227.50	Telephone conference with RRX, ALR, and NAZ re status of witness binders, trial binders, and indexes
07/31/2023	Vincent Yang	VXY	0.7	\$325.00	\$227.50	Setup and correspond with printing vendor re printing witness binders
08/01/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review and analyze file transfer to printer and email re same.
08/01/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with JLM re update to calendar entry of the Pre-Trial Conference
08/01/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Create binder covers for Rowe and Lawrence witness binders.
08/01/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Work on witness binders: review and analyze email from printer, prepare slip pages for Lawrence and Rowe Binder and correspondence with VXY.
08/01/2023	Abigail L. Robinson	ALR	1.0	\$325.00	\$325.00	Prepare slip sheets and exhibit tabs for Rowe and Lawrence witness binders.
08/01/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Coordinate the deliver of printed exhibits for witness binders.
08/01/2023	Abigail L. Robinson	ALR	2.2	\$325.00	\$715.00	Assemble and Q/C Rowe and Lawrence witness binders.
08/01/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Review internal indexes and update PTO calendar - email to RRX re weekend availability
08/01/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Review correspondence from NAZ re printing requests.
08/01/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
08/01/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Call with RRX re updates to Para Availability Calendar for attorney review.
08/01/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated draft of Para Availability Calendar.
08/01/2023	Napoleon Zapata	NAZ	3.4	\$325.00	\$1,105.00	Begin preparing updated CEG trial binder for attorney review.
08/01/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated task list of upcoming trial prep projects and deadlines.
08/01/2023	Susan E. Huhta	SEH	1.1	\$850.00	\$935.00	Emails to and from AEM, S. Gelfand and GC re prep for trial/mock cross exam of plaintiff; review U. Rowe deposition digests and amended complaint.
08/01/2023	Vincent Yang	VXY	2.6	\$325.00	\$845.00	Compile witness binder exhibits and documents; coordinate with printing vendor re request for witness binder print jobs.
08/01/2023	Vincent Yang	VXY	2.4	\$325.00	\$780.00	Prepare print request and slip sheets re witness binders to vendor; correspond with vendor re same
08/02/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review correspondences from NAZ and SZG.
08/02/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review correspondence from GSC re witness binders.
08/02/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with VXY and NAZ re witness binder next steps.
08/02/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Continued correspondence with VXY and NAZ re witness binders and schedule a meeting
08/02/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Meet with VXY and NAZ.
08/02/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Organized next steps.
08/02/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Call with RRX re witness binders.
08/02/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Organize proposed plan for witness binder project - draft email to attys re proposed plan
08/02/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Call with GSC re proposed plan for witness binder project.
08/02/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Correspondence to LitOps Team re instructions from GSC.
08/02/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Call with RRX re witness binder project.
08/02/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Organize next steps of witness binder project.
08/02/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Begin to create excel tracker for Binder Project.
08/02/2023	Abigail L. Robinson	ALR	1.8	\$325.00	\$585.00	Continue to work on witness binder excel tracking and slip sheets for physical witness binders
08/02/2023	Abigail L. Robinson	ALR	1.0	\$325.00	\$325.00	Continue to work on slip sheets for witness binders.
08/02/2023	Abigail L. Robinson	ALR	1.1	\$325.00	\$357.50	Continue to work on slip sheets for witness binders.
08/02/2023	Abigail L. Robinson	ALR	1.0	\$325.00	\$325.00	Create LitOps Assignment tracker and update the Witness Binder tracker - email RRX, VXY, and NAZ links to tracker and proposed plan for Witness Binder project.
08/02/2023	Cara E. Greene	CEG	3.8	\$950.00	\$3,610.00	Exam prep meeting with GSC and client.
08/02/2023	Gregory S. Chiarello	GSC	5.7	\$800.00	\$4,560.00	Revise Rowe direct outline (1.4); conferences with Lit Ops (.5); client meeting (3.8)
08/02/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated task list of upcoming trial prep projects and deadlines.
08/02/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meeting with GSC re updates to witness binders preparation workflow, and next steps.,
08/02/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	QC Tariq Shaikat and Will Grannis witness binders to identify necessary updates to hard copies in advance of attorney review.
08/02/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meetings with RRX re updates to witness binders, status updates, and upcoming trial prep projects.

Rowe v. Google LLC
Case No. 19-cv-08655 (JHR)
Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
08/02/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Meeting with VXY, and ALR re recap of meeting with GSC, updates to witness binder preparation workflow, and upcoming trial prep projects.
08/02/2023	Napoleon Zapata	NAZ	4.2	\$325.00	\$1,365.00	Prepare, finalize, and QC updated CEG trial binder for attorney review
08/02/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with ALR, VXY, and SZG re preparation of updated CEG trial binder for attorney review
08/02/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with VXY, and ALR re recap of meeting with GSC, and updates to witness binder preparation workflow.
08/02/2023	Naomi Campusano	NCX	2.8	\$350.00	\$980.00	Ingest written discovery into Nuix.
08/02/2023	Susan E. Huhta	SEH	0.5	\$850.00	\$425.00	Begin review of summary judgment briefs.
08/02/2023	Vincent Yang	VXY	0.7	\$325.00	\$227.50	Correspondence with team and vendor re witness binders.
08/02/2023	Vincent Yang	VXY	0.7	\$325.00	\$227.50	Conference with ALR and NAZ re witness binders.
08/02/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Update coverage tracker calendar.
08/02/2023	Vincent Yang	VXY	1.4	\$325.00	\$455.00	Edit slip sheets re witness binder PDF files for exhibits.
08/02/2023	Vincent Yang	VXY	2.5	\$325.00	\$812.50	Add witness binder deposition transcript annotations to reconcile exhibits
08/03/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review NAZ email re CEG's binder.
08/03/2023	Abigail L. Robinson	ALR	3.3	\$325.00	\$1,072.50	Update the Rowe witness binder.
08/03/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Conference with RRX re next steps.
08/03/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Correspondence with GSC re updates to the Rowe witness binder.
08/03/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review emails from VXY and NAZ re Witness Binders.
08/03/2023	Abigail L. Robinson	ALR	2.2	\$325.00	\$715.00	Construct Lawrence witness binder.
08/03/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Conference with NAZ re Q/C assignment.
08/03/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Update Assignment tracker and email to VXY and NAZ re next steps.
08/03/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Update assignment trackers and email to RRX.
08/03/2023	Cara E. Greene	CEG	4.1	\$950.00	\$3,895.00	Telephone call with K. Gage (.2); work on trial examination outlines (3.2); conference with GSC re trial strategy (.7)
08/03/2023	Gregory S. Chiarello	GSC	1.5	\$800.00	\$1,200.00	Update Rowe direct outline (.8); conference with CEG (.7).
08/03/2023	Makaria S. Yami	MSY	0.5	\$325.00	\$162.50	Assist ALR with witness binder.
08/03/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
08/03/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with ALR, RRX, and VXY re upcoming projects, and QC of witness binder contents
08/03/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meeting with ALR re workflow for QC of electronic documents inside of witness binders in advance of printing hard copies.
08/03/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and compile notes re meeting with ALR re workflow for QC of electronic documents inside of witness binders in advance of printing hard copies.
08/03/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with RRX, GSC, CEG, and SZG re TextMap trial usage, and upcoming demo of general features and functionality.
08/03/2023	Napoleon Zapata	NAZ	2.8	\$325.00	\$910.00	QC electronic versions of witness binders in advance of sending to vendor for printing hard copies for attorney review.
08/03/2023	Naomi Campusano	NCX	3.2	\$350.00	\$1,120.00	Ingest transcripts and exhibits into Nuix trial casebook.
08/03/2023	Naomi Campusano	NCX	0.2	\$350.00	\$70.00	Change CaseMap suite user access for attorneys.
08/03/2023	Shira Gelfand	SZG	4.3	\$425.00	\$1,827.50	Continue compiling interview feedback from Rensin and memo re same (1.8); drafting Wilson outline (2.1); correspondence re Defendant's demonstrative A and client medical leave (.4).
08/03/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Conference with RRX re trial technology.
08/03/2023	Vincent Yang	VXY	6.3	\$325.00	\$2,047.50	Apply annotations to witness transcripts re exhibits' correlation to trial exhibits and update expert Ostrofe witness binder and deposition index.
08/04/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review email from NAZ re textmap.
08/04/2023	Abigail L. Robinson	ALR	1.6	\$325.00	\$520.00	Create slip sheets for Witness Binders.
08/04/2023	Abigail L. Robinson	ALR	0.7	\$325.00	\$227.50	Organize LitOps tracker and witness binder tracker.
08/04/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Review trial play book.
08/04/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Update witness binder tracker.
08/04/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Continue to work on slip sheets for Witness Binders.
08/04/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Conference with RRX.
08/04/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Q/C slipsheets for Witness Binders.
08/04/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Continue to work on slipsheets for Witness Binders.
08/04/2023	Abigail L. Robinson	ALR	1.0	\$325.00	\$325.00	Conference with RRX, VXT, and NAZ re next steps for Witness binder assignment.
08/04/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Organize notes from LitOps meeting re Witness Binder assignment, edit trackers based on meeting and email updates.
08/04/2023	Abigail L. Robinson	ALR	0.7	\$325.00	\$227.50	Continue to work on slipsheets for Witness Binders.
08/04/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Correspondences with VXY re deposition exhibits vs. trial exhibits.
08/04/2023	Cara E. Greene	CEG	7.3	\$950.00	\$6,935.00	Client preparation session and related work (4.4); conference with Lit Ops (.4); conferences with CEG re Rowe direct, opening (2.5).
08/04/2023	Gregory S. Chiarello	GSC	7.3	\$800.00	\$5,840.00	Client preparation session and related work (4.4); conference with Lit Ops (.4); conferences with CEG re Rowe direct, opening (2.5).
08/04/2023	Makaria S. Yami	MSY	0.2	\$325.00	\$65.00	Save document from docket.
08/04/2023	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Conference with RRX, VXY, and ALR re updated workflow for completing witness binders by end of next week for attorney review, trial equipment, and trial logistics in advance of upcoming trial.
08/04/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated draft of paralegal availability calendar in advance of circulating for attorney review
08/04/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with RRX, SZG, CEG, and GSC re updates to paralegal availability calendar
08/04/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Conference with VXY re witness binder status updates, and upcoming trial prep projects
08/04/2023	Napoleon Zapata	NAZ	0.9	\$325.00	\$292.50	QC electronic versions of witness binders in advance of sending to vendor for printing hard copies for attorney review.
08/04/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re conference with VXY re witness binder status updates, and upcoming trial prep projects.
08/04/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
08/04/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated task list of upcoming trial prep projects and deadlines.
08/04/2023	Naomi Campusano	NCX	1.2	\$350.00	\$420.00	Finalize Nuix trial casebook and correspond with team re same.
08/04/2023	Naomi Campusano	NCX	0.7	\$350.00	\$245.00	Review video transcript deliverables in Rowe.
08/04/2023	Susan E. Huhta	SEH	1.5	\$850.00	\$1,275.00	Review summary judgment briefs and order/opinion denying summary judgment; notes re areas to cover in mock cross.
08/04/2023	Shira Gelfand	SZG	4.4	\$425.00	\$1,870.00	Call with CEG re demonstratives (.2); call with counsel (.2); review of demonstratives for accuracy (.6); correspondence with team (.3); correspondence with counsel (.2); continue drafting witness outline (2.9).
08/04/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Replace witness binder transcripts.
08/04/2023	Vincent Yang	VXY	0.9	\$325.00	\$292.50	Conference with RRX and NAZ re witness binder assembly.
08/04/2023	Vincent Yang	VXY	6.1	\$325.00	\$1,982.50	Assemble witness binders and fix Grannis binder and prepare binders for printing
08/07/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review VXY's email to HJ re printing assignment.
08/07/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review assignment list.
08/07/2023	Abigail L. Robinson	ALR	1.9	\$325.00	\$617.50	Organize exhibits tabs and create labels for the Lucas and Vardaman witness binders.
08/07/2023	Abigail L. Robinson	ALR	3.7	\$325.00	\$1,202.50	Q/C deposition exhibits vs. trial exhibits - create a primary index.
08/07/2023	Abigail L. Robinson	ALR	0.9	\$325.00	\$292.50	Q/C Witness Binder project at large and create the Witness binder check list map.

Rowe v. Google LLC
Case No. 19-cv-08655 (JHR)
Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
08/07/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Q/C Defendant Trial exhibits 46&48.
08/07/2023	Abigail L. Robinson	ALR	1.3	\$325.00	\$422.50	Construct half of the Vardaman Witness binder.
08/07/2023	Abigail L. Robinson	ALR	0.8	\$325.00	\$260.00	Q/C Vardaman witness binder.
08/07/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Q/C Wilson and Eryuek deposition exhibits vs. trial exhibits.
08/07/2023	Abigail L. Robinson	ALR	1.1	\$325.00	\$357.50	Various conferences with RRX, VXY, and NAZ re witness trial binder assignments
08/07/2023	Abigail L. Robinson	ALR	1.2	\$325.00	\$390.00	Draft and send various correspondences to CEG, GSC, and SZG re ongoing updates and feedback re Witness binder assignment.
08/07/2023	Cara E. Greene	CEG	3.9	\$950.00	\$3,705.00	Work on Grannis trial outline.
08/07/2023	Gregory S. Chiarello	GSC	5.7	\$800.00	\$4,560.00	Review exhibits and draft Rowe cross examination outline.
08/07/2023	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Meetings with ALR and RRX re updates to Tariq Shaukat and Will Grannis witness binders per meeting with CEG, workflow for printing witness binders, and upcoming trial prep projects.
08/07/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
08/07/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated task list of upcoming trial prep projects and deadlines.
08/07/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with ALR, RRX, and VXY re updates to witness binder task list in advance of circulating to attorneys
08/07/2023	Napoleon Zapata	NAZ	4.4	\$325.00	\$1,430.00	Begin preparation and assembly of Kevin Lucas witness binder in advance of attorney review and analysis
08/07/2023	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Prepare and assemble witness binder spines and covers.
08/07/2023	Napoleon Zapata	NAZ	0.9	\$325.00	\$292.50	Finalize, and QC Kevin Lucas witness binder.
08/07/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting with ALR re review of binder indexes for Everen Eryurek and Ben Wilson in advance of creating slipsheets, and preparing witness binders.
08/07/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re meeting with ALR re review of binder indexes for Everen Eryurek and Ben Wilson in advance of creating slipsheets, and preparing witness binders.
08/07/2023	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Review and QC CEG trial binder exhibit list and master combined exhibit list to identify the plaintiff trial exhibits that defendant exhibits 30-35 are subsets of.
08/07/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with ALR re review and QC of CEG trial binder exhibit list and master combined exhibit list to identify the plaintiff trial exhibits that defendant exhibits 30-35 are subsets of.
08/07/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with CEG re updates to Tariq Shaukat and Will Grannis witness binders, and witness binder prioritization
08/07/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with CEG re updates to Tariq Shaukat and Will Grannis witness binders, and additional updates to apply to remaining witness binders going forward in advance of assembly.
08/07/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting with ALR, and VXY re witness binder preparation progress, updates to witness binder workflow, and next steps.
08/07/2023	Shira Gelfand	SZG	3.6	\$425.00	\$1,530.00	Correspondence with Google (.2); correspondence with teams re binder and review documents (.8); correspondence with CEG and GSC re documents (.2); continue drafting witness outlines (2.4).
08/07/2023	Vincent Yang	VXY	5.0	\$325.00	\$1,625.00	Finalize Shaukat and Grannis witness binders.
08/07/2023	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Conferences with team re binder assembly and index quality checks.
08/07/2023	Vincent Yang	VXY	3.5	\$325.00	\$1,137.50	Reconcile witness binder indexes re exhibit overlaps.
08/08/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review emails from LitOps and Witness Binder tracker.
08/08/2023	Cara E. Greene	CEG	6.1	\$950.00	\$5,795.00	Text map training (.8); annotate Grannis deposition transcript (2.5); annotate Shaukat deposition transcript (2.8)
08/08/2023	Gregory S. Chiarello	GSC	2.1	\$800.00	\$1,680.00	Draft Rowe cross prep outline.
08/08/2023	Makaria S. Yami	MSY	2.6	\$325.00	\$845.00	Work on witness binders.
08/08/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated task list of upcoming trial prep projects and deadlines.
08/08/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
08/08/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Correspondence with RRX and VXY re witness binder status updates, witness binder workflow, and upcoming trial prep tasks.
08/08/2023	Shira Gelfand	SZG	3.7	\$425.00	\$1,572.50	Meeting re textmap (.8); review software re same (.2); continue drafting direct exam outlines (2.4); correspondence with team re documents (.3).
08/08/2023	Vincent Yang	VXY	10.0	\$325.00	\$3,250.00	Finish compiling witness binders per attorney specifications.
08/08/2023	Vincent Yang	VXY	2.0	\$325.00	\$650.00	Compile electronic witness binders and update indexes.
08/09/2023	Cara E. Greene	CEG	5.4	\$950.00	\$5,130.00	Continue working on Grannis examination outline.
08/09/2023	Gregory S. Chiarello	GSC	4.1	\$800.00	\$3,280.00	Draft Rowe cross preparation outline (3.6); draft opening (.5)
08/09/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated task list of upcoming trial prep projects and deadlines.
08/09/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
08/09/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated draft of trial playbook with updated LitOps To Dos list
08/09/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Prepare updated draft of witness binder tracker with status updates per witness binder.
08/09/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with RRX, VXY, and ALR re updates to witness binder tracker, and trial playbook
08/09/2023	Susan E. Huhta	SEH	1.0	\$850.00	\$850.00	Call with S. Gelfand re prep for cross exam; texts to and from S. Gelfand re same; email from S. Gelfand re same; notes re cross exam.
08/09/2023	Shira Gelfand	SZG	2.2	\$425.00	\$935.00	Edit and supplement chart of qualifications to include data from 3 additional comparators (1.8); correspondence re exhibits (.2); correspondence with client (.2).
08/09/2023	Shira Gelfand	SZG	0.8	\$425.00	\$340.00	Call with SEH re mock cross.
08/09/2023	Vincent Yang	VXY	1.7	\$325.00	\$552.50	Finish compiling witness binders.
08/10/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Conference with RRX re status of witness binders and next steps.
08/10/2023	Abigail L. Robinson	ALR	0.8	\$325.00	\$260.00	Review and update witness tracker, review trial play-book, coordinate meeting with RRX, and email to attys re next steps.
08/10/2023	Cara E. Greene	CEG	6.7	\$950.00	\$6,365.00	Conference with client, GSC to prep for cross examination (3.0); continue working on Grannis examination outline (3.7).
08/10/2023	Gregory S. Chiarello	GSC	6.2	\$800.00	\$4,960.00	Review M. Lawrence docs and draft witness outline topics (2.7); Rowe cross examination preparation (.5); meeting with client, CEG (3.0).
08/10/2023	Jennifer Davidson	JDX	0.2	\$425.00	\$85.00	Correspond with SZG re: expert witness direct examinations and gather documents re: same.
08/10/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
08/10/2023	Susan E. Huhta	SEH	0.4	\$850.00	\$340.00	Emails to and from S. Gelfand re prep for cross examinations; locate materials re same
08/10/2023	Shira Gelfand	SZG	2.1	\$425.00	\$892.50	Edit and supplement chart of qualifications (.6); correspondence with team (.3); review of documents (.5); meeting with CEG (.2); attention to production to counsel (.5).
08/10/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Conference with RRX re trial software and pending tasks.
08/11/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Update trial play book LitOps assignment tracker.
08/11/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review production and communication with NAZ re same.
08/11/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Draft agenda for LitOps meeting.
08/11/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Prepare for LitOps team meeting.
08/11/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	LitOps Team Meeting with RRX, VXY, and NAZ.
08/11/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Draft and send update email to SZG.
08/11/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Update LitOps Assignment tracker.
08/11/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review email from SZG and inform calendar team of new deadline
08/11/2023	Cara E. Greene	CEG	4.7	\$950.00	\$4,465.00	Work on drafting T. Shaukat examination outline.
08/11/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
08/11/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with ALR re witness binder status updates and additional tasks to complete.
08/11/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with NCX, SZG, and VXY re ingestion of documents into Nuix in advance of upcoming production
08/11/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Update and circulate calendar of paralegal availability for attorney review

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
08/11/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated task list of upcoming trial prep projects.
08/11/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Conference with RRX, ALR, and VXY re witness binder status updates, trial prep projects, trial supplies, and in office litops support schedule.
08/11/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Prepare and circulate typed notes re conference with RRX, ALR, and VXY re witness binder status updates, trial prep projects, trial supplies, and in office litops support schedule.
08/11/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Upload files to file repository, run ingestion, image, OCR, Index, and identify of duplicate emails within ingested documents.
08/11/2023	Shira Gelfand	SZG	3.8	\$425.00	\$1,615.00	Begin drafting expert outline and review report (2.7); attention to production to defendant (.8); correspondence with team (.3).
08/11/2023	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Conference with RRX, ALR, and NAZ re trial agenda.
08/11/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspond with HJ to print additional exhibit for witness binder
08/14/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review email re status of new production.
08/14/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review email from RRX re installing deposition program - email to IT re same
08/14/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review NAZ email re trial box.
08/14/2023	Cara E. Greene	CEG	4.6	\$950.00	\$4,370.00	Continue working on Shaukat trial exam outline.
08/14/2023	Gregory S. Chiarello	GSC	2.5	\$800.00	\$2,000.00	REvise, edit Rowe direct outline.
08/14/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Review ingested documents and prepare filevine task re attorney review and coding of documents after ingestion into Nuix in advance of preparing for production.
08/14/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with VXY, SZG, and GHK re coding ingested documents and preparing ingested and coded documents for production.
08/14/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with RRX re updates to initial draft of trial box index in advance of circulating to attorneys for review.
08/14/2023	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Prepare initial draft of trial box index to track trial dates of live witness testimony, and documents and items to bring on those days in advance of circulating to attorneys for review.
08/14/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated task list of upcoming trial prep projects and deadlines.
08/14/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
08/14/2023	Shira Gelfand	SZG	5.7	\$425.00	\$2,422.50	Attention to and preparation of document production (.8); continue drafting witness outlines (4.4); correspondence with team (.3); correspondence with TQ re deposition digest task (.2).
08/14/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Correspondence with NAZ and Nuix team re producing emails.
08/15/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Review tasks list for Litops, trial play book, and trial schedule tracker template
08/15/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Conference with RRX re setting up Trial playbook and trial scheduling
08/15/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review emails between VXY and SZG re production.
08/15/2023	Cara E. Greene	CEG	5.4	\$950.00	\$5,130.00	Conference with GSC re cross exam topics (.6); continue working on Grannis examination outline (4.8)
08/15/2023	Gregory S. Chiarello	GSC	3.8	\$800.00	\$3,040.00	REVise Rowe direct outline (3.2); conference with CEG re cross-examination strategy (.6)
08/15/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
08/15/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated task list of upcoming trial prep projects and deadlines.
08/15/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Correspondence with GHK, VXY, and SZG re running production of emails and transmitting completed production to opposing counsel.
08/15/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Run searches in Filevine to identify previous privilege logs for review.
08/15/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Meeting with HJ re trial supplies in advance of ordering for upcoming Trial
08/15/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with VXY, and review emails re witness binders in advance of preparing updates to witness binders.
08/15/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Meeting with RRX re updates to witness binders, updates to trial box index, and upcoming trial tech demo in advance of upcoming trial.
08/15/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Organize witness binders in alphanumeric order in advance of attorney review
08/15/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with HJ re trial supplies in advance of ordering for upcoming Trial
08/15/2023	Shira Gelfand	SZG	6.2	\$425.00	\$2,635.00	Attention to finalizing production to Defendant (.5); draft performance review feedback chart (1.8); draft interview scores feedback chart (1.5); continue drafting witness outlines (1.7); correspondence with team and prepare agenda for team meeting (.5); correspondence with counsel (.2).
08/15/2023	Tara K. Quaglion	TKQ	9.2	\$450.00	\$4,140.00	Review Nora Ostrofe depositions; draft depo digest regarding same.
08/15/2023	Vincent Yang	VXY	0.7	\$325.00	\$227.50	Prepare cover letter and certificate of service re production; serve production on opposing counsel
08/16/2023	Abigail L. Robinson	ALR	2.6	\$325.00	\$845.00	Update trial play book, draft agenda for LitOps Team Meeting.
08/16/2023	Abigail L. Robinson	ALR	1.0	\$325.00	\$325.00	Lit Ops Team Meeting with RRX, VXY, and NAZ on next steps.
08/16/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Review TextMap process with NAZ.
08/16/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Organize LitOps meeting notes and update Trial Play book based on Lit Ops meeting.
08/16/2023	Cara E. Greene	CEG	9.9	\$950.00	\$9,405.00	Team meeting (.8); continue drafting Shaukat examination outline (9.1).
08/16/2023	Gregory S. Chiarello	GSC	3.2	\$800.00	\$2,560.00	Revise cross prep outline (1.3); Rowe direct outline revisions and related correspondence (1.1); team meeting (.8)
08/16/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated draft of trial playbook with updated master index of document and file locations
08/16/2023	Napoleon Zapata	NAZ	1.3	\$325.00	\$422.50	LitOps check in meeting with RRX, ALR, and VXY, re updates to witness binders, trial technology, trial playbook, and upcoming amended joint pretrial order filing together with possible hard copy submission to the Court.
08/16/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Begin to review and compile notes re LitOps check in meeting with RRX, ALR, and VXY, re updates to witness binders, trial technology, trial playbook, and upcoming amended joint pretrial order filing together with possible hard copy submission to the Court.
08/16/2023	Susan E. Huhta	SEH	0.1	\$850.00	\$85.00	Emails to and from GC and CEG re planned mock cross exam.
08/16/2023	Shira Gelfand	SZG	5.4	\$425.00	\$2,295.00	Review and prepare documents for CEG re Breslow, FSVL role, Tariq's org chart and damages (3); prep for and attend team meeting (1.1); correspondence with team re joint limiting instruction (.2); review JPTO re damages section (1.1).
08/16/2023	Shira Gelfand	SZG	0.5	\$425.00	\$212.50	Correspondence re additional exhibits and interviewer feedback for FSVL role.
08/16/2023	Tara K. Quaglion	TKQ	9.6	\$450.00	\$4,320.00	Review Nora Ostrofe depositions; draft depo digest regarding same.
08/16/2023	Vincent Yang	VXY	0.7	\$325.00	\$227.50	Compile and send direct examination exhibits to U. Rowe.
08/16/2023	Vincent Yang	VXY	0.7	\$325.00	\$227.50	Conference with NAZ, RRX, and ALR re trial agenda and timelines.
08/17/2023	Abigail L. Robinson	ALR	1.5	\$325.00	\$487.50	Create electronic copy of exhibit binder for exhibits that were designated for advanced ruling
08/17/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Correspondence to RRX, VXY, and NAZ re ongoing assignments.
08/17/2023	Abigail L. Robinson	ALR	0.7	\$325.00	\$227.50	Create covers, portfolio, and index for exhibit binder of exhibits designated for advanced ruling
08/17/2023	Abigail L. Robinson	ALR	1.3	\$325.00	\$422.50	Begin work on Trial/witness scheduler.
08/17/2023	Cara E. Greene	CEG	5.1	\$950.00	\$4,845.00	Correspondence with SZG, GSC re trial strategy (.3); cross-exam prep with client, GSC (3.0); continue working on Shaukat outline (1.8).
08/17/2023	Gregory S. Chiarello	GSC	4.2	\$800.00	\$3,360.00	Rowe cross preparation (.4); review potential exhibits for Lawrence examination (.4); meeting with client, CEG (3.0); conference with CEG (.3); team correspondence (.1).
08/17/2023	Jennifer LaMarch	JLM	0.1	\$350.00	\$35.00	Docket/calendar control.
08/17/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
08/17/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated draft of Trial Playbook with updated Master Index file locations tab
08/17/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with RRX, SZG, and ALR re trial conference binder, and creation of a location to save deposition materials into Filevine.
08/17/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Organize deposition transcripts, exhibits, synced video, and digests in Filevine for attorney review

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
08/17/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with HJ re missing trial supplies to order in advance of upcoming trial
08/17/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Begin adding cross reference of deposition exhibits, and equivalent plaintiff and defendant trial exhibits in deposition transcripts within TextMap for attorney review.
08/17/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Update and circulate most recently updated draft of weekend paralegal availability, and out of office calendar for attorney review.
08/17/2023	Shira Gelfand	SZG	4.6	\$425.00	\$1,955.00	Continue drafting witness outlines (1.9); attention to JPTC binder prep and correspondence re same (.6); correspondence re damages and review expert report and JPTO, correspondence with team re same (1.2); edit master timeline (.4); compile documents for CEG and GSC (.3); correspondence with CEG (.2).
08/17/2023	Tara K. Quaglion	TKQ	2.4	\$450.00	\$1,080.00	Review Nora Ostrofe depositions; draft depo digest regarding same.
08/17/2023	Vincent Yang	VXY	0.9	\$325.00	\$292.50	Conference with RRX re trial tech run through and setup.
08/17/2023	Vincent Yang	VXY	1.8	\$325.00	\$585.00	Compile pretrial conference binder.
08/17/2023	Vincent Yang	VXY	1.4	\$325.00	\$455.00	Assemble trial documents in Sanction.
08/18/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Lit Ops meeting with RRX, NAZ, and VXY.
08/18/2023	Cara E. Greene	CEG	6.9	\$950.00	\$6,555.00	Conference with SZG re trial tasks, expert outline, schedule, witness strategy (2.8); memo to team re same (.6); continue working on Shaukat outline (3.5).
08/18/2023	Gregory S. Chiarello	GSC	0.2	\$800.00	\$160.00	Team correspondence re revised JPTO.
08/18/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
08/18/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Litops Rowe check in meeting with RRX, ALR, and VXY re status updates, cross reference of deposition exhibit and trial exhibits equivalents in TextMap, trial supply list, and additional upcoming trial prep projects.
08/18/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with SZG re NAZ 2023 September out of office schedule in advance of upcoming team trial prep meetings for upcoming trial.
08/18/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Prepare updated draft of trial supply list in advance of circulating to attorneys for approval to order for upcoming trial.
08/18/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with HJ, ALR, RRX, DJ, and VXY re updated draft of trial supply list in advance of circulating to attorneys for approval to order for upcoming trial.
08/18/2023	Napoleon Zapata	NAZ	2.9	\$325.00	\$942.50	Begin preparing cross reference of deposition exhibits and trial exhibit equivalents in TextMap
08/18/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with RRX re preparation of cross reference of deposition exhibits and trial exhibit equivalents in TextMap.
08/18/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with RRX re scheduling of Trial Tech demo
08/18/2023	Shira Gelfand	SZG	5.7	\$425.00	\$2,422.50	Correspondence re damages update (.2); meeting with CEG (2.6); prepare and edit draft response to Google re outstanding items (.2); begin drafting Humez witness objectives for cross examination (1.2); continue drafting expert witness outline and correspondence with expert re meeting (1.3); schedule team meetings and correspondence re trial plan (.2);
08/18/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Conference with NAZ, ALR, and RRX re trial agenda.
08/18/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Attend to team correspondence re projects.
08/21/2023	Abigail L. Robinson	ALR	1.2	\$325.00	\$390.00	Review witness documents and update trial calendar.
08/21/2023	Abigail L. Robinson	ALR	2.1	\$325.00	\$682.50	Continue to review witness materials and create trial scheduler.
08/21/2023	Cara E. Greene	CEG	4.2	\$950.00	\$3,990.00	Work on closing argument outline.
08/21/2023	Napoleon Zapata	NAZ	5.5	\$325.00	\$1,787.50	Continue preparing cross reference of deposition exhibits and trial exhibit equivalents in TextMap
08/21/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated task list of upcoming trial prep projects and deadlines.
08/21/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated draft of trial supply list in advance of circulating to attorneys for approval to purchase supplies
08/21/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
08/21/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with VXY, RRX, DJ, and ALR re trial supplies to order for upcoming trial
08/21/2023	Shira Gelfand	SZG	6.3	\$425.00	\$2,677.50	Continue drafting outlines (5.2); review samples and Mauet trial book re expert examination (.8); correspondence re third party witness interviews (.3).
08/21/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Conference with RRX re trial agenda and technology.
08/21/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspondence with SZG re trial tech allowance letter.
08/21/2023	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Attend to team correspondences re trial tasks.
08/22/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review and respond to SZG email re new assignment.
08/22/2023	Abigail L. Robinson	ALR	1.0	\$325.00	\$325.00	Review exhibits and timeline to prepare for witness calls.
08/22/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Review SZG notes and prepare notes for witness calls, attempt calls with SZG.
08/22/2023	Cara E. Greene	CEG	2.1	\$950.00	\$1,995.00	Call with S. Gelfand re third party witnesses and correspondence re same (.2); continue working on closing arguments outline (1.9).
08/22/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence and meetings with RRX, HJ, DJ, AMW, and MBX re trial supplies for upcoming trial
08/22/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Begin review of Judge Rearden's rules in advance of filing amended joint pretrial order, and submission of hard copies to the Court.
08/22/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with ALR, and VXY re upcoming conference calls with SZG and clients
08/22/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated task list of upcoming trial prep projects and deadlines.
08/22/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Update witness binder covers and spines.
08/22/2023	Shira Gelfand	SZG	4.8	\$425.00	\$2,040.00	Continue drafting witness direct examination outlines (3.6); draft script for witness interviews (.5); call with CEG re witness interviews (.2); call with AR and call to witnesses (.5).
08/22/2023	Vincent Yang	VXY	1.2	\$325.00	\$390.00	Conference with RRX re trial tech walk through with witness outline; discuss deposition clip software
08/22/2023	Vincent Yang	VXY	2.8	\$325.00	\$910.00	Update trial software Sanction database and compile presentation exhibits per outline on trial laptop
08/23/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review email from CEG re 3rd party witness calls.
08/23/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Attempt calls to 3rd party witnesses with SZG.
08/23/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Follow up with LitOps Team on outstanding assignments.
08/23/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review emails from VXY and RRX re Trial calendar - save trial calendar in Filevine
08/23/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Q/C Trial calendar and draft email to attorneys re same.
08/23/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Update trial play book assignment list correspondence with NAZ re same.
08/23/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated draft of weekend paralegal availability and out of office calendar in advance of circulating to attorneys.
08/23/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with MBX and HJ and re purchasing trial supplies in advance of upcoming trial
08/23/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Continue preparing cross reference of deposition exhibits and trial exhibit equivalents in TextMap
08/23/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with RRX, ALR, and VXY re status update of cross reference of deposition exhibits and trial exhibit equivalents in TextMap.
08/23/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Review initial draft of trial scheduler in advance of circulating to attorneys
08/23/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated task list of upcoming trial prep projects and deadlines.
08/23/2023	Shira Gelfand	SZG	3.5	\$425.00	\$1,487.50	Call third party witnesses with AR (.1); attention to witness outlines and trial prep (3.4)
08/23/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspondence with ALR re trial scheduler.
08/24/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Meet with RRX regarding Sanctions Trial software.
08/24/2023	Shira Gelfand	SZG	3.2	\$425.00	\$1,360.00	Begin drafting Harteau witness outline (3); correspondence with client re STD leave (.2)
08/25/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Meeting with RRX and VXY.
08/25/2023	Shira Gelfand	SZG	5.3	\$425.00	\$2,252.50	Continue drafting Harteau outline and send to team (1.5); begin preparing for joint pre-trial conference by reviewing exhibits and objections, research re hearsay exceptions (3.8).
08/25/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Telephone conference with RRX and ALR re trial agenda and tasks.
08/25/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Correspondence with RRX and IT re tech download.

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
08/28/2023	Cara E. Greene	CEG	3.6	\$950.00	\$3,420.00	Continue working on closing argument and correspondence to GSC re same.
08/28/2023	Gregory S. Chiarello	GSC	2.3	\$800.00	\$1,840.00	Draft opening statement.
08/28/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
08/28/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with HJ, MBX, SZG, and AMW re supplies to order for supply list, and attorney approval to order supplies.
08/28/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated task list of upcoming trial prep projects and deadlines.
08/29/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review email re electronics hardware.
08/29/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Draft and send follow up email to attorneys re JPTO.
08/29/2023	Gregory S. Chiarello	GSC	1.6	\$800.00	\$1,280.00	Draft M. Lawrence examination outline (.4); draft opening statement (1.2).
08/29/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated task list of upcoming trial prep projects and deadlines.
08/29/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
08/29/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with ALR, VXY, RRX, HJ, and MBX re trial laptop passwords and charger testing
08/29/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Replenish office supplies in Jay conference room for attorney use
08/29/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Meeting with HJ re office supplies to order in advance of upcoming trial
08/29/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated draft of trial playbook with updated supply list template, and technology passwords
08/29/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with ALR re status updates, additional trial prep projects, upcoming submission of courtesy copies to Chambers with upcoming amended JPTO filing.
08/29/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with ALR, VXY, and RRX re updated documents to submit as courtesy copies to Chambers with upcoming amended JPTO filing.
08/29/2023	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Review Judge's rules to identify updated documents to submit as courtesy copies to Chambers with upcoming amended JPTO filing.
08/29/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Correspond with team re trail tech.
08/30/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Correspondence with NAZ re logistics of courtesy copies.
08/30/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Correspondence with NAX re logistics of courtesy copies.
08/30/2023	Gregory S. Chiarello	GSC	4.5	\$800.00	\$3,600.00	Rowe direct examination edits (1.3); client meeting (3.0); draft Lawrence examination outline (.2)
08/30/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated task list of upcoming trial prep projects and deadlines.
08/30/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
08/30/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Correspondence with HJ and ALR re delivery of courtesy copies of updated documents connected to upcoming amended JPTO filing.
08/31/2023	Gregory S. Chiarello	GSC	3.2	\$800.00	\$2,560.00	Edit Rowe direct outline per client meeting (.5); draft opening statement (2.0); review Grannis deposition (.7)
09/01/2023	Gregory S. Chiarello	GSC	1.3	\$800.00	\$1,040.00	Draft Lawrence examination (.9); draft opening statement (.4).
09/01/2023	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Correspondence with client re Google employee grievance, review documents re same.
09/05/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with HJ re upcoming submission of courtesy copies to chambers pertaining to upcoming amended joint pretrial order filing.
09/05/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with ALR, VXY, and HJ re documents to include with upcoming submission of courtesy copies to chambers.
09/05/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with HJ re box labels to print to include with box of courtesy copies to submit to chambers
09/05/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated task list of upcoming trial prep projects and deadlines.
09/06/2023	Gregory S. Chiarello	GSC	1.6	\$800.00	\$1,280.00	Draft opening statement.
09/06/2023	Shira Gelfand	SZG	3.7	\$425.00	\$1,572.50	Edit and supplement JPTO and appendix A (1.4); prep for pre-trial conference exhibit objections (2.3)
09/07/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Review past email from NAZ re courtesy copy delivery, email to HJ re status.
09/07/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondences with SZG re status of JPTO.
09/07/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with SZG re status of updated JPTO.
09/07/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Draft updated cover letter for courtesy copies to Court.
09/07/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Prepare for filing - review prior JPTO filing and exhibits
09/07/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with TAM and JLM re logistics of JPTO filing.
09/07/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Format and send JPTO exhibits to SZG.
09/07/2023	Cara E. Greene	CEG	4.6	\$950.00	\$4,370.00	Lucas outline (1.7); team correspondence (.2); telephone call with SZG re updated JPTO and JPTC (.4); Burdis outline (2.3).
09/07/2023	Gregory S. Chiarello	GSC	3.1	\$800.00	\$2,480.00	Draft opening statement (2.5); correspondence with client (.1); M. Lawrence examination outline (.5)
09/07/2023	Susan E. Huhta	SEH	0.1	\$850.00	\$85.00	Email from S. Gelfand re mock cross.
09/07/2023	Shira Gelfand	SZG	5.8	\$425.00	\$2,465.00	Continue preparing for joint pre trial conference and exhibit objections (3.8); correspondence with GSC re depositor transcripts (.2); continue preparing for JPTO filing, correspondence with Google re same (1); check in with CEG re JPTO and JPTC (.4); attention to filing (.4).
09/07/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Correspondence with SZG re amended pretrial order filing
09/07/2023	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Upload and send deposition videos to client for review.
09/07/2023	Vincent Yang	VXY	2.4	\$325.00	\$780.00	Re-upload and send deposition videos to client; await JPTO filing
09/08/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Correspondence with SZG and JLM re updated deadline of JPTO filing
09/08/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Review updates to calendar from SZG and send LitOps status email.
09/08/2023	Cara E. Greene	CEG	3.1	\$950.00	\$2,945.00	Work on closing argument, outlines.
09/08/2023	Gregory S. Chiarello	GSC	2.1	\$800.00	\$1,680.00	Draft M. Lawrence examination outline (1.5); draft opening statement (.4); team correspondence (.2)
09/08/2023	Susan E. Huhta	SEH	0.1	\$850.00	\$85.00	Call (vmail) to S. Gelfand re prep for mock cross exam.
09/08/2023	Shira Gelfand	SZG	3.2	\$425.00	\$1,360.00	Correspondence with counsel and edits to JPTO (.3); prepare for JPTC and review of exhibits and objections (2.6); correspondence with team (.3).
09/11/2023	Cara E. Greene	CEG	3.5	\$950.00	\$3,325.00	Conference with SZG re JPTC exhibits and oral arguments (1.0); work on examination outlines and review Rowe outline (2.5).
09/11/2023	Gregory S. Chiarello	GSC	4.1	\$800.00	\$3,280.00	Draft opening statement.
09/11/2023	Lindsay M. Goldbrum	LMG	0.2	\$450.00	\$90.00	Telephone conference with GSC re staffing (.2).
09/11/2023	Susan E. Huhta	SEH	4.0	\$850.00	\$3,400.00	Texts to and from S. Gelfand re mock cross exam prep; emails to and from GC re same; review client dep transcript re same; call w/S. Gelfand re same; review key documents re same; emails to and from AEM re key documents re same.
09/11/2023	Shira Gelfand	SZG	4.7	\$425.00	\$1,997.50	Continue preparing for JPTC (1.2); meeting with CEG re JPTC exhibits and oral argument (1); begin drafting questionnaire for mock jury (.8); attention to planning mock jury event and correspondence re same (.4); call with SEH and prepare exhibits for mock cross (1.3).
09/11/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspondence with SZG re mock direct preparation.
09/12/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Correspondence with RRX and NAZ re location of meeting.
09/12/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Sent out link to RRX and NAZ.
09/12/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Review trial play-book to prepare for meeting.
09/12/2023	Abigail L. Robinson	ALR	1.0	\$325.00	\$325.00	Trial Preparation meeting with CEG, GSC, SZG, LMG, RRX, VXY, and NAZ discussion upcoming JPTO, Pretrial conference, witnesses, and general trial preparation.
09/12/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Organize and circulate notes and next steps.
09/12/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Review NAZ notes and emails with NAZ and TAM.
09/12/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Conference with TAM re objectives of meeting note taking.
09/12/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Update calendar meeting dates.
09/12/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review task list with VXY.
09/12/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Update trial play-book with LitOps ToDos.

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
09/12/2023	Cara E. Greene	CEG	6.2	\$950.00	\$5,890.00	Conference with litigation team re trial planning and prepare for same (1.0); trial planning meeting with GSC, SZG (1.2); correspondence re witness list and B. Wilson (.3); review correspondence to court (.1); review Burdis deposition and identify designations (1.2); litigation team lunch (1.0); work on Lucas outline (1.4).
09/12/2023	Gregory S. Chiarello	GSC	4.5	\$800.00	\$3,600.00	Team meeting with Lit Ops (1.0); Team meetings (2.3); Rowe cross preparation (1.2)
09/12/2023	Jennifer Davidson	JDX	0.1	\$425.00	\$42.50	Correspond with SZG re: hearsay exceptions.
09/12/2023	Lindsay M. Goldbrum	LMG	2.1	\$450.00	\$945.00	Zoom team meeting with paralegals, CEG, GSX, and SZG (.8); telephone conference re strategy with CEG, GSC, and SZG (1.2); review correspondence re transcript designations (.1).
09/12/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
09/12/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with ALR and RRX re upcoming team meetings and status updates.
09/12/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated task list of upcoming trial prep projects and deadlines.
09/12/2023	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Prepare meeting notes for 9/12/23 all team meeting with Attorneys and LitOps in advance of circulation
09/12/2023	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	All team meeting with SZG, CEG, GSC, RRX, ALR, and VXY re mock jury project, trial and weekend schedule, witnesses, and updates to joint pretrial order and deposition testimony in advance of upcoming trial.
09/12/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with ALR and VXY re updated deposition designations. and supply list
09/12/2023	Robert S. Rivera	RRX	1.0	\$350.00	\$350.00	Trial preparation meeting with CEG, GSC, SZG, LMG, ALR, VXY and NAZ regarding upcoming JPTO, pretrial conference and witnesses.
09/12/2023	Susan E. Huhta	SEH	8.1	\$850.00	\$6,885.00	Complete review of Rowe dep tr; review exhibits; re-review MSJ briefs and MSJ opinion; review draft direct exam of Rowe; emails to and from S. Gelfand re trial exhibits; emails to and from GC re call; begin outline of cross.
09/12/2023	Shira Gelfand	SZG	5.9	\$425.00	\$2,507.50	Team meetings re trial agenda (1); Prep agenda for team meetings (.3); correspondence with counsel (.2); correspondence with team (.4); attention to electronic device request forms for conference (.3); attention to Jenny Burdis deposition designations (1.8); prep for JPTC (1.3); call with SEH re mock cross (.4); attention to logistics re mock cross (.2).
09/12/2023	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Conference with GC, CEG, SZG, RRX, NAZ, and ALR re trial agenda and mock examination
09/12/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspondence with RRX re mock trial tech setup.
09/12/2023	Vincent Yang	VXY	3.7	\$325.00	\$1,202.50	Setup trial technology and update trial materials in advance of mock examination
09/13/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Review depo designations assignment, correspondence with NAZ re same. Update assignment tracker.
09/13/2023	Abigail L. Robinson	ALR	1.8	\$325.00	\$585.00	Add deposition lines into CEG's outline for Shaukat
09/13/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review email from Defendant Counsel's paralegal, email to CEG, GSC, and SZG re same.
09/13/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with IT re recording Mock Jury.
09/13/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Correspondence to Defendant Counsel's Paralegal re corrupted deposition videos.
09/13/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Further communication with IT re logistics of recording the Mock Jury
09/13/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Conference with RRX re logistics of Mock Jury.
09/13/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with SZG re hard copy of Plaintiff's deposition
09/13/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review assignment emails and further communication with IT re logistics for Mock Jury.
09/13/2023	Abigail L. Robinson	ALR	0.8	\$325.00	\$260.00	Continue to add deposition lines into CEG's outline for Shaukat.
09/13/2023	Abigail L. Robinson	ALR	1.3	\$325.00	\$422.50	Q/C additions of deposition lines into CEG's outline for Shaukat
09/13/2023	Cara E. Greene	CEG	6.7	\$950.00	\$6,365.00	Conference with GSC re Rowe examination strategy (.3); prep meeting with GSC, client (2.2); meet and confer meeting with opposing counsel (.6); work on Lucas outline (2.1); conference with SZG re objections to exhibits and JPTC (.4); draft email to opposing counsel re witness order (.2); telephone call with opposing counsel re witness order (.2); conference with GSC, SZG re witness order and call with KP re same (.4); conference with GSC re witness order and Donaldson/Strong testimony (.3).
09/13/2023	Gregory S. Chiarello	GSC	6.2	\$800.00	\$4,960.00	Conference with CEG re Rowe examination strategy (.3); conference with SZG re witness examination basics (.5); meeting with client (2.6); meeting with SEH, SZG re Rowe mock cross examination (.9); telephone call with team, Paul Hastings re JPTO and witness order (.6); revise Rowe direct examination outline/condense for mock (1.3).
09/13/2023	Lindsay M. Goldbrum	LMG	1.1	\$450.00	\$495.00	Review team correspondence (.2); correspondence with SZG re research (.1); research re order of witness testimony (.8).
09/13/2023	Michaela Dougherty	MDX	0.2	\$350.00	\$70.00	Conference with ALR re reformatting of transcript designations.
09/13/2023	Michaela Dougherty	MDX	0.4	\$350.00	\$140.00	Reformat transcript designations; correspondence with ALR re same.
09/13/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
09/13/2023	Napoleon Zapata	NAZ	2.1	\$325.00	\$682.50	Prepare Plaintiff and Defendant deposition designations in TextMap for Jennifer Burdis in advance of submitting courtesy copies of amended joint pretrial order and depositions with updated designations.
09/13/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with ALR and SZG re supply list in advance of upcoming trial
09/13/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated task list of upcoming trial prep projects and deadlines.
09/13/2023	Robert S. Rivera	RRX	0.3	\$350.00	\$105.00	Conference with ALR regarding logistics for mock jury.
09/13/2023	Robert S. Rivera	RRX	0.5	\$350.00	\$175.00	Conference with TAM, JLM, ALR, VXY and NAZ regarding JPTO, mock trial, and next steps
09/13/2023	Susan E. Huhta	SEH	3.4	\$850.00	\$2,890.00	Emails to and from S. Gelfand and GC re prep for cross exam; call w/GC and S. Gelfand re same
09/13/2023	Shira Gelfand	SZG	7.4	\$425.00	\$3,145.00	Meet and confer with opposing counsel (.6); correspondence with team re letter to court (.2); conduct research and begin drafting letter (2.4); call with SEH and GSC re mock cross (.9); correspondence with team re witness order (.2); call with CEG re JPTC prep (.4); continue research and prep for JPTC (1.9); research and provide argument notes for jury charge (.8).
09/13/2023	Vincent Yang	VXY	2.9	\$325.00	\$942.50	Review and configure trial director software.
09/13/2023	Vincent Yang	VXY	1.7	\$325.00	\$552.50	Install and configure depoview deposition videos.
09/14/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Conference with HJ re delivery of courtesy copy to Court.
09/14/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with HJ re Tri-Pod delivery.
09/14/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with Hector regarding the logistics of delivery to SDNY.
09/14/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Printout Plaintiff transcript and coordinate the binding
09/14/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Update the Trial play book.
09/14/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with GSC re his trial binder.
09/14/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review notes and emails to prepare for meeting with SZG.
09/14/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Conference with SZG, VXY, and NAZ re status updates on assignments.
09/14/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Finalize meeting notes and next steps from meeting with SZG, VXY, and NAZ.
09/14/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Conference with NAZ re depo designation in TextMap.
09/14/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Test technology for Mock Trial.
09/14/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Communication with SZG re Plaintiff's transcripts.
09/14/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Conference with RRX, TAM, JLM, VXY, and NAZ re JPTO, Mock Trial, and other next steps
09/14/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Coordinate with NAZ to print and assemble deposition transcript to CEG.
09/14/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Coordinate the printing and assembling of exhibits for SEH.
09/14/2023	Cara E. Greene	CEG	0.0	\$0.00	\$0.00	Correspondence re press inquiries (.4)(no charge).
09/14/2023	Cara E. Greene	CEG	7.0	\$950.00	\$6,650.00	Review and edit opening statement (1.2); conference with GSC re opening statement strategy (.5); review Google's Burdis designations and make cross-designations (.8); review Wilson deposition and make deposition designations (.9); conference with GSC re strategy for Rowe direct examination (.4); prepare space/materials for mock jury (1.4); conference with client, GSC re mock jury exercise (.4); continue working on opening argument (1.4).
09/14/2023	Gregory S. Chiarello	GSC	11.0	\$800.00	\$8,800.00	Revise direct and cross examination outlines (3.6); conferences/meetings with CEG re trial strategy (2.5); client meeting (3.5); preparation for mock direct (1.4).
09/14/2023	Jennifer LaMarch	JLM	0.5	\$350.00	\$175.00	LitOps team meeting.
09/14/2023	Lindsay M. Goldbrum	LMG	0.2	\$450.00	\$90.00	Review team correspondence.

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
09/14/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
09/14/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Update and circulate litops availability calendar for attorney review in advance of upcoming trial
09/14/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meeting with SZG, ALR, and VXY re status updates, mock trial project, witness binders, and assorted pending projects.
09/14/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meetings with ALR re status updates, deposition designations, and coverage for upcoming projects in advance of PTO.
09/14/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Conference with TAM, JLM, RRX, VXY, and ALR re status updates, amended JPTO filing, submission of courtesy copies to Court, and upcoming mock trial.
09/14/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meeting with RRX and ALR re technology setup and workflow of upcoming mock trial
09/14/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting and correspondence with ALR re updates to deposition designations for Stuart Vardaman
09/14/2023	Napoleon Zapata	NAZ	1.3	\$325.00	\$422.50	Prepare updated deposition designations for Stuart Vardaman, and deposition transcript with all designations and objections in advance of submitting courtesy copies to chambers.
09/14/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated draft of task list of upcoming trial prep projects and deadlines
09/14/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with RRX, ALR, and VXY re status updates pertaining to Jennifer Burdis and Ben Wilson deposition designations, and coverage for pending related tasks.
09/14/2023	Susan E. Huhta	SEH	7.5	\$850.00	\$6,375.00	Emails to and from GC and S. Gelfand re mock cross prep; review and prepare exhibits re same; emails to and from AEM re same; draft mock cross re same.
09/14/2023	Shira Gelfand	SZG	5.4	\$425.00	\$2,295.00	Correspondence with media team (.3); correspondence with team re mock cross preparation (.4); draft confidentiality agreement (.3); meeting with paralegals (.4); prep for JPTC by reviewing jury instructions and exhibits (1.8); correspondence with counsel (.2); review electronic device order from Rearden chambers (.1); call with CWL re JPTC prep (.5); attention to deposition designations (1.4);.
09/14/2023	Tracee A. Manettas	TAM	0.4	\$350.00	\$140.00	Attend Rowe trial prep meeting.
09/14/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Conference with GC re client U. Rowe's mock direct outline.
09/14/2023	Vincent Yang	VXY	0.4	\$325.00	\$130.00	Conference with SZG, ALR, and NAZ re pending trial tasks.
09/14/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Conference with RRX, JLM, TAM, ALR, and NAZ re trial mock and joint pretrial order updates
09/14/2023	Vincent Yang	VXY	2.5	\$325.00	\$812.50	Add deposition exhibits to Sanction and assemble exhibits re mock direct and cross of client
09/14/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Compile exhibits re SEH mock cross of client.
09/15/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Review files for requested document. Correspondence with SZG re same. Print and assemble document.
09/15/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Set up, test recording audio, research data capacity of Android phones
09/15/2023	Abigail L. Robinson	ALR	2.5	\$325.00	\$812.50	Record the Mock Jury.
09/15/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Discuss logistics of depo designations assignment with RRX and VXY.
09/15/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Confirm Monday courtesy copy delivery logistics with HJ.
09/15/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Conference with JLM re filing the updated Joint Pre-trial Order
09/15/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Conference with VXY re courtesy copy and binder assignments for Monday.
09/15/2023	Abigail L. Robinson	ALR	2.3	\$325.00	\$747.50	Retrieve camera with Mock Jury recording, conference with SZG re attorney requests for viewing today. Conference with IT Dept re where to upload video files, download video files to computer and rename. Upload video files to Filevine.
09/15/2023	Abigail L. Robinson	ALR	1.0	\$325.00	\$325.00	Review CEG's outline for Grannis and add in deposition transcript lines
09/15/2023	Cara E. Greene	CEG	9.1	\$950.00	\$8,645.00	Prepare for Mock Jury exercise and complete juror questionnaire (1.0); mock jury and related de-brief (5.2); review Burdis cross-designations, identify Wilson cross-designations, review Google's objections to Wilson designations, review 2nd amended JPTO for filing (2.9).
09/15/2023	Gregory S. Chiarello	GSC	8.2	\$800.00	\$6,560.00	Mock direct and cross (3.5); debrief meetings with SEH and jurors (3.3); client meeting (1.0); conferences with CEG (.4).
09/15/2023	Lindsay M. Goldbrum	LMG	6.2	\$450.00	\$2,790.00	Atten mock client testimony and office conferences with CEG, GSC, SEH, SZG, and AVK (6.2)
09/15/2023	Makaria S. Yami	MSY	3.5	\$325.00	\$1,137.50	Attend mock jury and related conference to evaluate notes.
09/15/2023	Susan E. Huhta	SEH	8.2	\$850.00	\$6,970.00	Prep for mock trial, conduct mock cross, debriefing re same
09/15/2023	Shira Gelfand	SZG	9.7	\$425.00	\$4,122.50	Prep for and attend mock jury, debriefs with team (7.2); attention to JPTO filing and deposition designations (2.3) ; meeting with CEG re same (.2).
09/15/2023	Vincent Yang	VXY	3.0	\$325.00	\$975.00	Prepare for Plaintiff U. Rowe mock examination and conduct trial exhibit technology in mock examination
09/15/2023	Vincent Yang	VXY	1.4	\$325.00	\$455.00	Add Wilson and Burdis designations to Textmap and print for CEG review
09/15/2023	Vincent Yang	VXY	1.1	\$325.00	\$357.50	Format amended joint pretrial order re designations.
09/15/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Conference with SZG re entering mock trial notes.
09/15/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Send Defendant counters to CEG.
09/17/2023	Shira Gelfand	SZG	5.7	\$425.00	\$2,422.50	Attention to JPTO filing (.5); correspondence with team re same (.3); annotate jury charge and conduct research re same in preparation for JPTC (3.2); prep for exhibit objections (1.7).
09/18/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Correspondence with SZG re courtesy copy of JPTO.
09/18/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with RRX re updated timeline of the JPTO.
09/18/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Coordinate with SZG and HJ re delivery of courtesy copies.
09/18/2023	Abigail L. Robinson	ALR	0.7	\$325.00	\$227.50	Q/C the additions of deposition transcript lines to Grannis outline
09/18/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with TAM re expected work load.
09/18/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Scan in notes from Mock Jury save to FV and send to VXY.
09/18/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Review multiple emails on status up assignments and update tracker accordingly.
09/18/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review email from GSC re updates to his binder.
09/18/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Begin gathering documents for GSC's binder.
09/18/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Update Primary Exhibit List with Ex.151.
09/18/2023	Abigail L. Robinson	ALR	1.5	\$325.00	\$487.50	Work on complying the documents needed for GSC's binder and setting up tabs, cover sheets, and indexes
09/18/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with SZG and VXY re deposition designations.
09/18/2023	Abigail L. Robinson	ALR	1.5	\$325.00	\$487.50	Assemble GSC's binder and finalize index.
09/18/2023	Abigail L. Robinson	ALR	1.0	\$325.00	\$325.00	Print JPTO and Deposition transcripts for courtesy copies to judge.
09/18/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Communicate with SZG re updates to Depo Designation. Email LitOps Team re same.
09/18/2023	Abigail L. Robinson	ALR	0.8	\$325.00	\$260.00	Q/C Deposition Designation in preparation for courtesy copies to Chambers
09/18/2023	Cara E. Greene	CEG	0.0	\$0.00	\$0.00	Correspondence re press strategy (.3)(no charge).
09/18/2023	Cara E. Greene	CEG	4.8	\$950.00	\$4,560.00	Team planning meeting (1.7); prep re Penberthy and Stiekes examination (1.3); work on opening statement (.7); correspondence re expert and Harteau testimony scheduling and preparation (.3); review Grannis deposition and ER notes (.4); conference with SZG re JPTC prep and court courtesy copies (.4).
09/18/2023	Gregory S. Chiarello	GSC	5.9	\$800.00	\$4,720.00	Lit Ops correspondence (.1); Team meeting (1.7); correspondence re witnesses (.2); conference with CEG (.2); revise Rowe direct examination (2.8); correspondence with client (.2); general trial preparation (.7).
09/18/2023	Lindsay M. Goldbrum	LMG	0.1	\$450.00	\$45.00	Correspondence with SZG re research (.1).
09/18/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Save order.
09/18/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Save motion requesting leave for witness to testify remotely at trial.
09/18/2023	Susan E. Huhta	SEH	0.1	\$850.00	\$85.00	Email to CEG re follow-up assistance.
09/18/2023	Shira Gelfand	SZG	7.7	\$425.00	\$3,272.50	Attention to annotating jury charge (.8); team meeting re plan (1.7); correspondence with expert and third party witness (.5); correspondence with team re task list in preparation for JPTC (.3); correspondence with media team (.2); call with counsel re deposition transcripts (.2); review production from Defendant (2.6); attention to prep for exhibit arguments (1.4);.
09/18/2023	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Quality check pretrial order deposition designations.

Rowe v. Google LLC
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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
09/18/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Correspondence with team re pretrial order filing
09/18/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Conference with RRX re pending tasks and updates.
09/18/2023	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Download Defendant's production for import and circulate to team
09/18/2023	Vincent Yang	VXY	2.6	\$325.00	\$845.00	Compile mock juror notes and answers and circulate to team.
09/18/2023	Vincent Yang	VXY	1.1	\$325.00	\$357.50	Quality check deposition designations and add objections to courtesy copies of transcripts to Judge
09/19/2023	Abigail L. Robinson	ALR	1.5	\$325.00	\$487.50	Q/C Deposition Designation in preparation for courtesy copies to Chambers.
09/19/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Correspondence with SZG re depo designation Q/C.
09/19/2023	Abigail L. Robinson	ALR	1.3	\$325.00	\$422.50	Q/C Deposition Designations.
09/19/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Correspondence with LitOps Team re deposition designation Q/C and courtesy copies to Court
09/19/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with HJ, SZG, and VXY re courtesy copy delivery.
09/19/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review emails re status updates to deposition designations and courtesy copies.
09/19/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Update draft cover letter for Courtesy copies.
09/19/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Review and finalize cover letter for courtesy copy.
09/19/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Conference with VXY re status of courtesy copies to Chambers and GCS binder.
09/19/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Finalize delivery of courtesy copy details with HJ.
09/19/2023	Abigail L. Robinson	ALR	0.7	\$325.00	\$227.50	Q/C and create tabs for GSC binder.
09/19/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Prepare for team meeting with attorneys.
09/19/2023	Abigail L. Robinson	ALR	0.8	\$325.00	\$260.00	Conference with CEG, CSG, SZG, RRX, and VXY re updates on trial prep assignments and up coming assignments
09/19/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Organize LitOps Assignments post meeting with attorneys.
09/19/2023	Abigail L. Robinson	ALR	0.9	\$325.00	\$292.50	Conference with RRX and VXY re LitOps assignments and schedule for pre-trial and during trial
09/19/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Finalize GSC binder and email him re same.
09/19/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Format, update, and save Primary Exhibit Index.
09/19/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Update trial play-book.
09/19/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Scan in updated supply list and email to NAZ.
09/19/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Begin to gather documents for CEG's JPTC binder.
09/19/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Research for case in Lexis with AXM.
09/19/2023	Cara E. Greene	CEG	7.5	\$950.00	\$7,125.00	JPTC Prep with SZG (2.5); cork on trial outlines (1.0); telephone call with E. Mulvaney re trial (.5); full team meeting (1.0); conference with SZG, GSC re mock jury debrief and take-aways, and follow-up (3.5).
09/19/2023	Gregory S. Chiarello	GSC	7.4	\$800.00	\$5,920.00	Conference with SZG re Rowe direct testimony (.2); revise Rowe direct outline (3.8); team meeting re mock feedback (3.4).
09/19/2023	Lindsay M. Goldbrum	LMG	8.1	\$450.00	\$3,645.00	Team conference with CEG, GSC, SZG, RRX and lit ops (.8); review video from mock jury (.6); review mock jury notes and feedback (.4); telephone conference with CEG, GSC, and SZG (1.5); research for JPTO (4.8).
09/19/2023	Shira Gelfand	SZG	8.3	\$425.00	\$3,527.50	Prep for and meet with CEG re Rowe JPTC prep and moot (3.7); prepare agenda for team meeting (.2); attention to deposition designations and courtesy copies (.4); full team meeting and meeting with CEG, GSC, and LMG (3.1); correspondence with counsel re filings to court. (.3); review LMG research (.5).
09/19/2023	Vincent Yang	VXY	4.1	\$325.00	\$1,332.50	Update designations on transcripts and prepare courtesy copies of designations, exhibits, and joint pretrial order to Court.
09/19/2023	Vincent Yang	VXY	0.9	\$325.00	\$292.50	Conference with CEG, GC, SZG, ALR, and RRX re trial planning.
09/19/2023	Vincent Yang	VXY	1.1	\$325.00	\$357.50	Conference with RRX and ALR re trial tech and scheduling.
09/19/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Correspondence with CEG assistant re updating attorney calendars re paralegal availability.
09/19/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Organize task list re trial agenda items.
09/20/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Email with GSC re his trial binder.
09/20/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Email to SZG re sending cover letter to Opposing Counsel.
09/20/2023	Abigail L. Robinson	ALR	1.1	\$325.00	\$357.50	Gather electronic copies of the documents for CEG's binder for the JPTC.
09/20/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with VXY re adding objections to mini deposition transcripts
09/20/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Update Lawrence binder re GCS's instructions.
09/20/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Conference with AMW re adding paralegal schedules to attorney calendars.
09/20/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Draft and send email to AMW with paralegal schedule for entering into attorney calendars
09/20/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Email to VXY and NAZ re our scheduling and in office days next week
09/20/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Begin working on updates to Grannis, Lawrence, and Humez binders per SZG request.
09/20/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Conference with RRX re Lit Ops tasks and scheduling.
09/20/2023	Abigail L. Robinson	ALR	0.9	\$325.00	\$292.50	Print and assemble documents for CEG's JCPTO binder.
09/20/2023	Abigail L. Robinson	ALR	1.0	\$325.00	\$325.00	Q/C deposition objections.
09/20/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Update to CEG's binder for the JCPTO.
09/20/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Update to the Lawrence and Humez binder per SZG request.
09/20/2023	Abigail L. Robinson	ALR	2.9	\$325.00	\$942.50	Ongoing updates to trial and witness binders at attorney's requests, including retrieving documents, Q/Cing, printing and assembling, and communicating with attorneys and paralegals re same.
09/20/2023	Cara E. Greene	CEG	7.7	\$950.00	\$7,315.00	Edit opening statement (1.9); conference with GSC re same (1.1); prepare for JPTC (4.7)
09/20/2023	Gregory S. Chiarello	GSC	8.3	\$800.00	\$6,640.00	Revise limiting instruction re feedback hearsay (1.0); Lit Ops correspondence (1); team meeting (.5); meeting with CEG re Rowe direct testimony (2.2); team meeting (1.6); revise Rowe direct outline (2.9).
09/20/2023	Lindsay M. Goldbrum	LMG	1.3	\$450.00	\$585.00	Correspondence with SZG re research (.1); research for JPTO (1.2).
09/20/2023	Shira Gelfand	SZG	8.9	\$425.00	\$3,782.50	Call with counsel and chambers (.2); prep agenda and attend meeting with team re tasks (.7); attention to designations (2.5); correspondence re research and prep for JPTC and exhibit objection argument (4.3); review GSC edits on limiting instructions (.4); correspondence re media (.2); meeting with GSC and CEG (1.6).
09/20/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Update docket.
09/20/2023	Vincent Yang	VXY	2.6	\$325.00	\$845.00	Perform quality check on courtesy copies of designations and prepare minuscule designations and objections re CEG binder.
09/20/2023	Vincent Yang	VXY	3.4	\$325.00	\$1,105.00	Update and quality check designations, exhibits, and pretrial order documents in advance of pretrial conference
09/21/2023	Abigail L. Robinson	ALR	1.3	\$325.00	\$422.50	Update Assignment racker and begin to set up the Electronic Trial Binder
09/21/2023	Abigail L. Robinson	ALR	1.2	\$325.00	\$390.00	Create the Electronic trial binder.
09/21/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Draft agenda for the LitOps Team meeting. Email RRX re same.
09/21/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review email from VXY re status of assignments.
09/21/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Q/C deposition text clips.
09/21/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Q/C deposition text clips.
09/21/2023	Cara E. Greene	CEG	10.1	\$950.00	\$9,595.00	Prepare for JPTC (1.4); JPTC and correspondence with opposing counsel re same (1.8); team meeting re JPTC (.9); meet and confer with opposing counsel and prepare for same (1.4); work on witness outlines (4.6).
09/21/2023	Gregory S. Chiarello	GSC	8.0	\$800.00	\$6,400.00	Revise Rowe direct outline (1.6); Final Pre-trial conference (1.6); team meetings (2.7); meet and confer call with Google (.7); revise opening statement (.4).
09/21/2023	Lindsay M. Goldbrum	LMG	0.3	\$450.00	\$135.00	Review team correspondence (.2); correspondence with SZG re research (.1).
09/21/2023	Susan E. Huhta	SEH	0.1	\$850.00	\$85.00	Email to GC re further trial prep assistance.
09/21/2023	Shira Gelfand	SZG	9.3	\$425.00	\$3,952.50	Prep for and attend joint pre trial conference (3.2); debrief with CEG and GSC (.9); research and prepare joint letter to court re Florissi (4.3); meet and confer with counsel (.7); correspondence with paralegals re tasks (.2).
09/21/2023	Vincent Yang	VXY	2.0	\$325.00	\$650.00	Update witness binders re additional documents and exhibit updates; update indexes re same.
09/21/2023	Vincent Yang	VXY	4.2	\$325.00	\$1,365.00	Prepare deposition designations text clips and video clips and calculate durations
09/21/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Update N. Harteau subpoena.
09/22/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Update Agenda for team meeting and email with RRX re same.

Rowe v. Google LLC
Case No. 19-cv-08655 (JHR)
Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
09/22/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Update Electronics Trial Binder.
09/22/2023	Abigail L. Robinson	ALR	1.0	\$325.00	\$325.00	Litigation Operations meeting re pending Pre-trial assignments and scheduling.
09/22/2023	Abigail L. Robinson	ALR	0.7	\$325.00	\$227.50	Organize meeting notes and LitOps assignments as well as correspondence with SZG and VXY re same.
09/22/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Update Trial playbook and witness tracker.
09/22/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Correspondence with JLM, SZG, and VXY re status of filing. Review PACER filing options to know what filing option to use.
09/22/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Review and respond to NAZ's email re updates to indexes and hard copy binders
09/22/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with SZG and VXY re FTP login - save information to file
09/22/2023	Abigail L. Robinson	ALR	0.7	\$325.00	\$227.50	Read and review closely joint letter re Florissi to be up to date on case issue and to determine which filing option to select. Correspondence with JLM re same.
09/22/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review correspondences between SZG and opposing counsel re joint Florissi letter.
09/22/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Correspondence with SZG re filing logistics.
09/22/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review correspondence from opposing counsel re status of their edits to the joint Florissi letter. Correspondence with JLM re same.
09/22/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Run a compare and review updated joint letter from defendants. Finalize formatting and convert to a PDF for filing.
09/22/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Communication with SZG and JLM re same. Receive updated instructions to hold the filing.
09/22/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review emails from RRX and NAZ re trial agenda.
09/22/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Receive update from SZG re filing.
09/22/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review our footnote addition to the Joint Letter and email to Defendants.
09/22/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Review and put updated final into PDF for filing, address formatting issue with exhibit PDF. Correspondence with SZG and JLM re same.
09/22/2023	Cara E. Greene	CEG	6.8	\$950.00	\$6,460.00	Prep meeting with client (2.5); review and edit letter to court (.9); work on trial outlines (3.4)
09/22/2023	Gregory S. Chiarello	GSC	4.1	\$800.00	\$3,280.00	Client meeting (3.5); edit Florissi letter, correspondence re same (.6)
09/22/2023	Jennifer LaMarch	JLM	0.4	\$350.00	\$140.00	File joint letter re objections to testimony.
09/22/2023	Napoleon Zapata	NAZ	1.9	\$325.00	\$617.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
09/22/2023	Napoleon Zapata	NAZ	0.9	\$325.00	\$292.50	Prepare updated task list of upcoming trial prep projects and deadlines.
09/22/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated draft of trial playbook with updated master index of trial document locations
09/22/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review plaintiff trial exhibit binders to identify attorney copy with attorney notes
09/22/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Update plaintiff trial exhibit binders with additional plaintiff trial exhibits and tabs
09/22/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with RRX, VXY, and ALR re updating plaintiff trial exhibit binders, and preparation of additional set of plaintiff trial exhibit binders.
09/22/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Meeting with RRX re status updates, upcoming trial prep projects, trial schedule, and preparation of additional set of plaintiff trial exhibits for litops use.
09/22/2023	Napoleon Zapata	NAZ	0.9	\$325.00	\$292.50	Meeting with VXY, ALR, and RRX re status updates, pending trial prep tasks, updates to plaintiff trial exhibit binders, leadup to trial and trial scheduling.
09/22/2023	Shira Gelfand	SZG	7.9	\$425.00	\$3,357.50	Continue drafting and editing letter re Florissi (5.8); attention to preparing documents for expert and client to review (1.4); call with CEG (.2); correspondence with counsel (.2); attention to filing (.3).
09/22/2023	Tracee A. Manettas	TAM	0.9	\$350.00	\$315.00	Attend meeting with RRX, ALR, VXY and NAZ re trial prep planning
09/22/2023	Vincent Yang	VXY	0.9	\$325.00	\$292.50	Conference with RRX, TAM, ALR and NAZ re trial logistics, file management, and document updates
09/22/2023	Vincent Yang	VXY	1.4	\$325.00	\$455.00	Prepare performance evaluations and hiring packets for client review and send same
09/22/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Send materials to expert for review.
09/22/2023	Vincent Yang	VXY	2.0	\$325.00	\$650.00	Update trial laptop re designation video clips and text clips.
09/23/2023	Cara E. Greene	CEG	0.9	\$950.00	\$855.00	Correspondence with GSC re client email to googlers (.2); work on trial strategy outline (.7)
09/23/2023	Shira Gelfand	SZG	2.2	\$425.00	\$935.00	Prep questions for Harteau meeting and edit direct examination outline.
09/24/2023	Abigail L. Robinson	ALR	1.9	\$325.00	\$617.50	Coordinate with SZG and NAZ to find documents in Nuix and send to Plaintiff via file transfer
09/24/2023	Cara E. Greene	CEG	5.1	\$950.00	\$4,845.00	Prep meeting with client and conference with GSC (4.3); work on trial outlines (.8)
09/24/2023	Gregory S. Chiarello	GSC	8.8	\$800.00	\$7,040.00	Revise opening statement (1.7); conferences with CEG (1.1); client meeting with CEG (6.0).
09/24/2023	Napoleon Zapata	NAZ	0.9	\$325.00	\$292.50	Conference with ALR re preparation of searches in Nuix to identify and pull gHire packets for attorney review in advance of sending to client.
09/24/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	QC searches in Nuix to identify and pull gHire packets for attorney review in advance of sending to client
09/24/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with SZG, RRX, and ALR re preparing searches in Nuix to identify and pull gHire packets for attorney review in advance of sending to client.
09/24/2023	Shira Gelfand	SZG	2.8	\$425.00	\$1,190.00	Correspondence with team; prepare chart comparing hiring packet offers.
09/25/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review emails and agenda from SZG.
09/25/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Correspondences with SZG re updating subpoena, ordering transcript, and updating Technical Director charts
09/25/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Conference with CEG, GSC, SZG, RRX, and NAZ re status updates on old assignments and instructions on new assignments.
09/25/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Conference with NAZ re trial exhibit binders.
09/25/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Schedule meeting with SZG re Technical Directors Chart assignment.
09/25/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Send out updated LitOps ToDo List based on meeting with attorneys.
09/25/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Conference with NAZ re electronics order.
09/25/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Work on edits to the Harteau subpoena.
09/25/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Review NAZ's updates to the supply list.
09/25/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Process Minutes Entry to folder.
09/25/2023	Abigail L. Robinson	ALR	0.8	\$325.00	\$260.00	Update witness tracker. Q/C against latest JPTO.
09/25/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Draft updated electronics device order. Send to RRX for his review.
09/25/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review Technical Director Charts ahead of meeting with SZG.
09/25/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Conference with SZG re Technical Director Chart assignment.
09/25/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Update electronic devices order per SZG feedback.
09/25/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Finalize and email Harteau subpoena to Counsel.
09/25/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Finalize and send second draft of the electronics device order to SZG for her review
09/25/2023	Abigail L. Robinson	ALR	1.4	\$325.00	\$455.00	Review Nuix documents and update Technical Director Chart 1.
09/25/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Conference with NAZ re hard copy exhibit binders.
09/25/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Continue to work on Technical Director Chart 1.
09/25/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Conduct Nuix searches for information required for Technical Director Chart 2
09/25/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Conference with NAZ re Primary Index Q/C.
09/25/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Retrieve requested materials for attorneys and conference with NAZ re new trial schedule
09/25/2023	Abigail L. Robinson	ALR	0.9	\$325.00	\$292.50	Continue Nuix searches for materials need to complete Technical Director Chart 2
09/25/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Update LitOps Assignment List and email to team.
09/25/2023	Cara E. Greene	CEG	7.0	\$950.00	\$6,650.00	Prep meeting with client (3.5); team strategy meetings (.5); work on outlines and trial strategy (3.0).
09/25/2023	Gregory S. Chiarello	GSC	13.7	\$800.00	\$10,960.00	Prep meeting with client, CEG (3.5); team meetings (1.1); revise Rowe direct outline (3.6); review N. Harteau outline and questions (.4); conferences with SZG (.7); team meeting re Ct Order limiting trial time (4.4).
09/25/2023	Lindsay M. Goldbrum	LMG	3.6	\$450.00	\$1,620.00	Review summary judgment briefing and motions in limine (3.6).
09/25/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Save filed joint letter to court re witness in case files.
09/25/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Save minute entry re final pretrial conference.
09/25/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Prepare deposition transcripts and exhibits for sending to expert for review in advance of upcoming trial

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
09/25/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meeting with RRX re Nuix support for upcoming trial, and workflow for navigating and searching within Nuix database.
09/25/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Full team meeting with CEG, SZG, GSC, RRX, and ALR re status updates, pending trial prep projects, and updates to Nora Ostrofe witness binder in advance of preparing expert for trial.
09/25/2023	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Prepare and organize plaintiff trial exhibits, declarations, and demonstratives in advance of updating witness binder for Nora Ostrofe.
09/25/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meetings and correspondence with ALR, and SZG re preparation and organization of plaintiff trial exhibits, declarations, and demonstratives in advance of updating witness binder for Nora Ostrofe.
09/25/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Assemble and QC updated draft of Nora Ostrofe witness binder in advance of delivering to CEG
09/25/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
09/25/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Prepare updated draft of task list of pending trial prep projects.
09/25/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meetings with RRX and ALR re trial supplies, and additional copies of plaintiff and defendant trial exhibit binders to prepare for litops use in advance of upcoming trial.
09/25/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with NCX and RRX re searching and navigating Rowe and Rowe trial nuix database
09/25/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Review defendant trial exhibit binder to identify discrepancies between physical binder, electronic defendant trial exhibits and combined trial exhibit list.
09/25/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting with ALR re discrepancies between defendant trial exhibit list inside of physical defendant trial exhibit binder and combined trial exhibit list.
09/25/2023	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Begin QC of combined trial exhibit list to identify and correct discrepancies between it, and defendant trial exhibit list inside of physical defendant trial exhibit binder.
09/25/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Scan defendant trial exhibit list inside of physical defendant trial exhibit binder for litops reference
09/25/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meetings with ALR re status updates and pending trial prep projects.
09/25/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with ALR and GHK re preparing saved searches in Rowe Nuix database.
09/25/2023	Shira Gelfand	SZG	9.8	\$425.00	\$4,165.00	Prepare agenda and attend team meetings (2.2); meeting with AR re L8 comparison project (.2); draft letter to court re trial logistics and stipulations (1.2); attention to Harteau meeting prep and correspondence with GSC re same (4.2); review court order and team meeting re new trial order (.6); call with N. Ostrofe re trial testimony (.2); review court order re Florissi and correspondence with team re same (1.4).
09/26/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review email from Paul Hastings re meet and confer.
09/26/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Print out Hon. Rearden's updated Individual Rules.
09/26/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Review the transcript of the Joint Pre-Trial Conference.
09/26/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review Orders at ECF Document numbers 315 and 316.
09/26/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Begin to update the Technical Director Chart 2.
09/26/2023	Abigail L. Robinson	ALR	0.8	\$325.00	\$260.00	Conference with RRX, VXY, and NAZ re updates to trial schedule, LitOps ToDo Items, and hard copy documents
09/26/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Finalize electronics order and email to SZG.
09/26/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Update LitOps task list.
09/26/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Update Technical Director Chart 2.
09/26/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Continue to work on updating the Technical Director Chart 2
09/26/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review emails with status updates and new assignments - updates LitOps ToDo List accordingly.
09/26/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Conference with SZG re trial schedule and upcoming action items.
09/26/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Conference with RRX, VXY, and NAZ re hard copy documents to take to court
09/26/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Conference with RRX and VXY re depo designations.
09/26/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review email re official deposition transcript and conference with NAZ re same
09/26/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Conference with RRX re status of ongoing assignments and future scheduling needs.
09/26/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review emails on status of ongoing assignments and review new assignment re Florissi binder.
09/26/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Continue to work on Technical Director Chart.
09/26/2023	Cara E. Greene	CEG	11.9	\$950.00	\$11,305.00	Telephone call with client; team meeting re witness order and new trial strategy; review deposition testimony for length and content and redesignate; letter to opposing counsel re open issues and correspondence re same.
09/26/2023	Gregory S. Chiarello	GSC	9.5	\$800.00	\$7,600.00	Meeting with N. Harteau, SZG (2.1); preparation for same (.3); revise opening statement (2.7); team meeting (3.2); revise Rowe direct outline (1.2).
09/26/2023	Jennifer LaMarch	JLM	0.3	\$350.00	\$105.00	Docket/calendar control.
09/26/2023	Lindsay M. Goldbrum	LMG	3.7	\$450.00	\$1,665.00	Research re time limits (3.4); correspondence with CEG, SZG, and GSC re research re time limits (.3)
09/26/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Save order re witness testimony and trial schedule.
09/26/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Prepare updated draft of task list of upcoming trial prep projects and deadlines
09/26/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
09/26/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Finalize QC of combined trial exhibit list to identify and correct discrepancies between it, and defendant trial exhibit list inside of physical defendant trial exhibit binder.
09/26/2023	Napoleon Zapata	NAZ	3.7	\$325.00	\$1,202.50	Prepare, assemble, and QC copy of plaintiff trial exhibit binders in advance of upcoming trial
09/26/2023	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Meeting with RRX, ALR, and VXY re status updates, pending trial prep projects, and upcoming litops tasks in advance of upcoming trial.
09/26/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and compile notes re meeting with RRX, ALR, and VXY re status updates, pending trial prep projects, and upcoming litops tasks in advance of upcoming trial.
09/26/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meetings with RRX, ALR, and VXY re stamped and sealed official hard copies of deposition transcripts
09/26/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Calls with Veritext re ordering of sealed and stamped hard copies of official deposition transcripts of Nora Ostrofe
09/26/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Calls with US Legal re pricing and turnaround time for ordering of sealed and stamped hard copies of official deposition transcripts.
09/26/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Correspondence with Veritext, and RRX re ordering of sealed and stamped hard copies of official deposition transcripts of Nora Ostrofe.
09/26/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Review deposition transcripts to identify and log court reporter contact information in advance of ordering stamped and sealed official deposition transcripts.
09/26/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Prepare defendant trial exhibits for printing and assembly of additional copy of defendant trial exhibit binders
09/26/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting and correspondence with HJ re printing and assembly of additional copy of defendant trial exhibit binders in advance of upcoming trial.
09/26/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re meetings with RRX, ALR, and VXY re stamped and sealed official hard copies of deposition transcripts.
09/26/2023	Shira Gelfand	SZG	7.9	\$425.00	\$3,357.50	Prep for and attend meeting with N. Harteau (2.7); team meeting with CEG and GSC (2.5); Prepare documents and communications for Florissi deposition (2.2); attention to deposition notice and review electronic device request (.3); review LMG research (.2).
09/26/2023	Vincent Yang	VXY	0.6	\$325.00	\$195.00	Review team correspondences re trial task list and agendas.
09/26/2023	Vincent Yang	VXY	0.7	\$325.00	\$227.50	Conference with RRX, ALR, and NAZ re trial schedule and logistics and agenda
09/26/2023	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Calculate deposition testimony time re witness for trial.
09/26/2023	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Prepare witness P. Florissi deposition notice and coordinate court reporter and videographer
09/26/2023	Vincent Yang	VXY	1.5	\$325.00	\$487.50	Conference with RRX re Sanction presentation for witnesses.
09/26/2023	Vincent Yang	VXY	0.8	\$325.00	\$260.00	Make edits to Sanction video clips and compile designation play lists.
09/26/2023	Vincent Yang	VXY	0.6	\$325.00	\$195.00	Calculate witness deposition designation video clip durations for CEG.
09/26/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Calculate lines of text re deposition designations.
09/27/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review email from SZG re Florissi binder assignment.

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
09/27/2023	Abigail L. Robinson	ALR	1.6	\$325.00	\$520.00	Q/C and format Technical Director Charts and email to SZG.
09/27/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Review emails, FV, and Y-drive for the word copy of the 2nd Amended JPTO and correspondence with LMG, VXY, and NAZ re same.
09/27/2023	Abigail L. Robinson	ALR	2.5	\$325.00	\$812.50	Work on Florissi Binder: set up cover sheet and index templates, pull documents from Nuix, print and assemble
09/27/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with RRX, VXY, and NAZ re team huddle.
09/27/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Review email from Paul Hastings Paralegal and forward to SZG, RRX, and VXY
09/27/2023	Abigail L. Robinson	ALR	1.0	\$325.00	\$325.00	Process and reformat email files into chronological order and PDFs for printing and assembling for the Florissi binder.
09/27/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Update LitOps To Do List/Agenda for meeting.
09/27/2023	Abigail L. Robinson	ALR	0.9	\$325.00	\$292.50	LitOps team meeting with RRX, VXY, and NAZ.
09/27/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Begin to work on notes from LitOps team meeting.
09/27/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Receive new assignments from CEG. Conference with VXY and NAZ to strategize on assignments.
09/27/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Review Nuix reports process with NAZ to look for needed metadata for Florissi binder index
09/27/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Conference with NAZ re primary index Q/C.
09/27/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Finish updating LitOps updated To Do List and circulate to LitOps team.
09/27/2023	Abigail L. Robinson	ALR	1.8	\$325.00	\$585.00	Florissi Binder: finalize second set of documents, print, and assemble them into the binder, draft index for binder
09/27/2023	Gregory S. Chiarello	GSC	11.2	\$800.00	\$8,960.00	Revise Rowe direct examination (2.0); team meetings re trial strategy and witnesses (5.7); draft Tessier examination (.5); client meeting (3.0).
09/27/2023	Lindsay M. Goldbrum	LMG	0.1	\$450.00	\$45.00	Telephone conference with SZG re staffing and letter to court (.1)
09/27/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meetings and correspondence with RRX, VXY, and ALR re status updates for trial exhibit binder copies and sealed and stamped copies of official deposition transcripts.
09/27/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
09/27/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Prepare updated task list of upcoming trial prep projects and deadlines.
09/27/2023	Napoleon Zapata	NAZ	4.2	\$325.00	\$1,365.00	Continue QC of combined trial exhibit list in comparison to plaintiff and defendant trial exhibit lists filed with amended joint pretrial order.
09/27/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare load file search for Florissi documents in advance of upcoming Florissi deposition for attorney review
09/27/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Demo trial laptop to confirm necessary programs were installed in advance of upcoming trial
09/27/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review sealed official deposition transcripts to identify missing deposition transcripts to order in advance of upcoming trial.
09/27/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with US Legal re pricing estimates and turnaround time for ordering sealed and stamped official deposition transcripts.
09/27/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meetings and correspondence with DL, RRX, and DXS re sealed and stamped official deposition transcripts kept by Records.
09/27/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meetings with RRX re installation of TextMap on trial laptop in advance of upcoming trial
09/27/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Calls with US Legal re pricing estimates and turnaround time for ordering sealed and stamped official deposition transcripts.
09/27/2023	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Meeting with ALR, RRX, and VXY re status updates, pending trial prep projects, and upcoming events and meetings in advance of trial.
09/27/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with VXY re QC of combined trial exhibit list in comparison to plaintiff and defendant trial exhibit lists filed with second amended joint pretrial order.
09/27/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Run Nuix reports to pull and export required metadata from Florissi documents
09/27/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Meetings with ALR and RRX re status updates, trial logistics, and upcoming trial prep projects in advance of upcoming trial.
09/27/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Review and compile notes re meetings with RRX, ALR, CEG, GSC, and SZG.
09/27/2023	Naomi Campusano	NCX	0.3	\$350.00	\$105.00	Review and correspond with NZX re CaseMap spreadsheet installer.
09/27/2023	Shira Gelfand	SZG	9.3	\$425.00	\$3,952.50	Correspondence with client re direct examination questions (.6); correspondence re media strategy (.4); correspondence with ALR re TD comparison chart (.5); call with KXO re letter (.6); correspondence with opposing counsel (.5); attention to designations (6.2); attention to electronic device request and tech walkthrough (.5).
09/27/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Update witness P. Florissi deposition notice.
09/27/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Attend to team correspondences re trial tasks.
09/27/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspondence with court reporter services re scheduling.
09/27/2023	Vincent Yang	VXY	2.7	\$325.00	\$877.50	Format Excel files and calculate video clip times; replace outdated exhibits
09/27/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Prepare motion shell.
09/27/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Request check re court transcript invoice to accounting.
09/27/2023	Vincent Yang	VXY	0.9	\$325.00	\$292.50	Conference with RRX re deposition video presentation.
09/27/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Conference with SZG re status of designations and witnesses.
09/27/2023	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Conference with ALR, RRX, and NAZ re trial agenda.
09/27/2023	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Conference with CEG, GC, and SZG re marking up exhibit index and updating designations
09/27/2023	Vincent Yang	VXY	0.9	\$325.00	\$292.50	Code internal exhibit index re relevance and edit document titles.
09/27/2023	Vincent Yang	VXY	1.2	\$325.00	\$390.00	Calculate witness designation timings.
09/28/2023	Abigail L. Robinson	ALR	0.9	\$325.00	\$292.50	Receive Text Map training from NAZ to import designations.
09/28/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Conference with VXY re index assignment.
09/28/2023	Abigail L. Robinson	ALR	0.8	\$325.00	\$260.00	Conference with CEG, GSC, SZG, VXY, and NAZ re new assignments and schedule leading up to trial
09/28/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Conference with VXY and NAZ re dividing up new assignments from attorneys.
09/28/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Formate Defendants Designations for uploading to Text Map.
09/28/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Formate Florissi binder index.
09/28/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Conference with RRX re status of assignments and schedule for next week.
09/28/2023	Abigail L. Robinson	ALR	0.7	\$325.00	\$227.50	Finish formatting Florissi binder index and Q/C binder.
09/28/2023	Abigail L. Robinson	ALR	0.7	\$325.00	\$227.50	Q/C Deposition Designations.
09/28/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Update LitOps ToDo List and reschedule LitOps team check in.
09/28/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Email to LitOps re daily round up meeting.
09/28/2023	Abigail L. Robinson	ALR	2.2	\$325.00	\$715.00	Create individualized and color code witness exhibit lists.
09/28/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Email to Defendant's Counsel's Paralegal re Technology setup.
09/28/2023	Abigail L. Robinson	ALR	1.0	\$325.00	\$325.00	Conference with RRX, NCX, VXY, and NAZ re status of LitOps assignments, planning for pending assignments, and Nuix.
09/28/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Conference with VXY and NAZ re individualized color coded exhibit lists for witnesses
09/28/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	PDF Letter Motion and send to JLM for filing.
09/28/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Conference with SZG and VXY re email from Defendant's Counsel's Paralegal re exchanging hard copy exhibits
09/28/2023	Abigail L. Robinson	ALR	0.9	\$325.00	\$292.50	Q/C individualized, color coded witness exhibits lists.
09/28/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Process ECF Doc. No. 317.
09/28/2023	Cara E. Greene	CEG	9.7	\$950.00	\$9,215.00	Review and edit letter to court, review Google's deposition designations and cross-designate; prep meeting with client, conference with GSC re same, work on new trial outlines.
09/28/2023	Gregory S. Chiarello	GSC	10.8	\$800.00	\$8,640.00	Draft opening (2.5); edits to letter to ct re Grannis/Shaukat appearance (1.2); conferences with SZG (.7); team meeting (.8); Rowe cross preparation (.9); client meeting (3.1); edit Rowe direct outline (.5); draft Beaupain examination outline (1.1).
09/28/2023	Jennifer LaMarch	JLM	0.3	\$350.00	\$105.00	File letter motion to compel.

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
09/28/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Correspondence with SZG re availability to provide feedback on opening statement
09/28/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Prepared updated draft of task list containing pending trial prep projects
09/28/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
09/28/2023	Napoleon Zapata	NAZ	3.8	\$325.00	\$1,235.00	Prepare and QC CSV files containing plaintiff and defendant deposition designations in advance of importing into TextMap.
09/28/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Prepare deposition transcript exports with designations for printing for attorney review
09/28/2023	Napoleon Zapata	NAZ	1.2	\$325.00	\$390.00	Prepare and QC CSV files containing plaintiff counter designations in advance of importing into TextMap
09/28/2023	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Meeting with RRX, VXY, ALR, and NCX re status updates, pending trial prep projects, and Rowe trial Nuix database
09/28/2023	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Meetings with RRX, VXY, ALR, CEG, SZG, and GSC re status updates, plaintiff and defendant counter designations, weekend availability and upcoming trial prep projects.
09/28/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated draft of deposition log with updated court reporter and official sealed and stamped deposition transcript information.
09/28/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Calls and correspondence with Veritext re order of Ulku Rowe deposition transcripts
09/28/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with NCX and RRX re updates to, navigation, and organization of Rowe Trial Nuix database
09/28/2023	Naomi Campusano	NCX	0.3	\$350.00	\$105.00	Create Nuix trial casebook report.
09/28/2023	Naomi Campusano	NCX	0.8	\$350.00	\$280.00	Attend trial team meeting re updates.
09/28/2023	Naomi Campusano	NCX	1.2	\$350.00	\$420.00	Update Nuix trial casebook.
09/28/2023	Robert S. Rivera	RRX	1.0	\$350.00	\$350.00	Conference with ALR, NCX, VXY and NAZ regarding status of assignments, planning and Nuix
09/28/2023	Shira Gelfand	SZG	8.6	\$425.00	\$3,655.00	Correspondence re letter to court (.3); edit and supplement letter to court (2.2); meet with GSC re same (.7); full team meeting (.8); attention to designations (.9); edit Harteau outline (2.7); prepare list of issues to be researched (.8); correspondence with jury consultant (.2).
09/28/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Review steps re importing textmap files.
09/28/2023	Vincent Yang	VXY	0.8	\$325.00	\$260.00	Conference with CEG, GC, SZG, RRX, ALR, and NAZ re designations, trial boxes, pretrial order, and outlines
09/28/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Conference with ALR and NAZ re distribution of tasks.
09/28/2023	Vincent Yang	VXY	0.4	\$325.00	\$130.00	Quality check updated deposition designations on transcripts for CEG review.
09/28/2023	Vincent Yang	VXY	0.8	\$325.00	\$260.00	Calculate Defendant designation clip times and number of lines.
09/28/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspondence with court reporter re scheduling.
09/28/2023	Vincent Yang	VXY	2.4	\$325.00	\$780.00	Create database for backup trial laptop re exhibits, transcripts, videos, and discovery materials
09/28/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Correspondence with printing vendor re creating additional set of plaintiff exhibits
09/28/2023	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Conference with RRX, NCX, ALR, and NAZ re update on designations, binders, scheduling, databases
09/28/2023	Vincent Yang	VXY	0.7	\$325.00	\$227.50	Prepare lists of exhibits pertaining to each witness.
09/28/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Send exhibit files to vendor for printing and assembly.
09/29/2023	Abigail L. Robinson	ALR	1.1	\$325.00	\$357.50	Update the LitOps Assignment List and set agenda for LitOps meeting.
09/29/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Email with LitOps re designations.
09/29/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Process Dkt 318.
09/29/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence to NAZ re SZG message re designations.
09/29/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Correspondences with Defendant's Counsel's Paralegal re exhibits.
09/29/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with SZG re exhibits and communication with Defendant's Counsel's Paralegal.
09/29/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with VXY an NAZ re trial boxes.
09/29/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Correspondence with SZG re JPTO updates, review files for Appx A, correspondence with VXY re Appx A
09/29/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review email from NCX re Nuix materials.
09/29/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Update to Technical Director Charts.
09/29/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Conference with SZG re JPTO filing and designations.
09/29/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Update LitOps Assignment list based on information from SZG.
09/29/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Correspondence to SZG re objections.
09/29/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Update Appendix A of the JPTO.
09/29/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Additional updates to JPTO Appendix A based on SZG feedback.
09/29/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review emails for status updates on multiple assignments.
09/29/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Prep for LitOps Team Meeting.
09/29/2023	Abigail L. Robinson	ALR	0.8	\$325.00	\$260.00	LitOps daily status meeting with RRX, VXY, and NAZ.
09/29/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Circulate update ToDos based on meeting notes.
09/29/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Conference with NAZ re sending email to the attorneys.
09/29/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review and Process ECF Dkt No. 319.
09/29/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with VXY and NAZ checking in on assignments at EOD
09/29/2023	Cara E. Greene	CEG	0.4	\$950.00	\$380.00	Review objections to depo designations and telephone call with SZG re same.
09/29/2023	Gregory S. Chiarello	GSC	9.4	\$800.00	\$7,520.00	Draft Tessier outline (.4); draft Beaupain outline (.7); draft Breslow outline (4.2); review Harteau outline (.3); conference with SZG re Harteau outline (.7); review Rowe direct exhibits (1.2); conferences with CEG (.6); opening statement (1.3).
09/29/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Save motion to compel filing in case orders.
09/29/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Review order denying def's application for proper file title name
09/29/2023	Makaria S. Yami	MSY	0.2	\$325.00	\$65.00	Save letter response and declaration to motion to compel from Defs.
09/29/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated draft of task list with pending trial prep projects.
09/29/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
09/29/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with SZG, RRX, VXY, and ALR re plaintiff and defendant counter designations
09/29/2023	Napoleon Zapata	NAZ	2.4	\$325.00	\$780.00	Prepare and QC CSV files containing plaintiff and defendant counter designations in advance of importing to TextMap to add to deposition transcripts.
09/29/2023	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	QC deposition exhibits and trial exhibit equivalents added to deposition transcripts in advance of attorney review for upcoming trial.
09/29/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Meetings and correspondence with HJ re status updates pertaining to trial supplies, ordering additional trial supplies in advance of upcoming trial, and upcoming packages to receive.
09/29/2023	Napoleon Zapata	NAZ	2.8	\$325.00	\$910.00	Begin logging and packing trial supplies in advance of upcoming trial
09/29/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting with RRX re status updates, pending trial prep projects, and weekend project timeline
09/29/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Meeting with RRX re Rowe trial nuix database, pending projects, and nuix searching workflow
09/29/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Conference with RRX, VXY, and ALR re status updates, review of task list and pending trial prep projects, and weekend project timeline.
09/29/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Review and compile notes re meetings and conferences with RRX, VXY, and ALR re status updates, review of task list and pending trial prep projects, and weekend project timeline.
09/29/2023	Naomi Campusano	NCX	1.4	\$350.00	\$490.00	Meeting with NAZ re conducting document search in Nuix.
09/29/2023	Naomi Campusano	NCX	0.8	\$350.00	\$280.00	Finalize Nuix trial casebook report and correspond with team re same.
09/29/2023	Naomi Campusano	NCX	1.0	\$350.00	\$350.00	Ingest plaintiff exhibit in Nuix and correspond with NAZ re same
09/29/2023	Shira Gelfand	SZG	7.3	\$425.00	\$3,102.50	Attention to reviewing deposition designations and adding objections for Burdis, Eryurek, Wilson, Vardaman transcripts (1.8); correspondence with counsel re JPTO and depo transcripts (.2); review Google's letter to the court re Grannis and Shaikat and correspond re same (.4); correspondence with jury consultant and review initial analysis (.5); call with GSC re Harteau outline and edit re same (3.3); call with CEG re objections (.2); call with AXR re plan for filing and outstanding tasks (.2); attention to deposition logistics for Florissi deposition (.2); review edits to appendix a (list of plf exhibits) (.1);.

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
09/29/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Conference with court reporter re scheduling.
09/29/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Update Rowe case docket.
09/29/2023	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Perform quality check and export designations from Textmap for review.
09/29/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Correspond and search database re appendix a re pretrial order.
09/29/2023	Vincent Yang	VXY	0.7	\$325.00	\$227.50	Conference with RRX, NAZ and ALR re pending designations, trial boxes, trial schedule, etc
09/29/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspond with IT and reception re setup for P. Florissi deposition
09/29/2023	Vincent Yang	VXY	1.8	\$325.00	\$585.00	Add trial and deposition exhibit correlations in witness deposition transcripts
09/29/2023	Vincent Yang	VXY	0.9	\$325.00	\$292.50	Coordinate and manage trial box supplies.
09/29/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Prepare tech device request letter re jury consultant.
09/29/2023	Vincent Yang	VXY	0.8	\$325.00	\$260.00	Add plaintiff objections to deposition designation transcripts
09/29/2023	Vincent Yang	VXY	1.8	\$325.00	\$585.00	Create witness J. Burdis outline re exhibits to pull for designations.
09/30/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Q/C Plaintiff's objections to Defendant's designations.
09/30/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Email to CEG, GSC, and SZG re document for Courtroom.
09/30/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Continue to review Judge's Individual Rules.
09/30/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Review and update LitOps assignments - correspondence with VXY and NAZ requesting status updates.
09/30/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Correspondence with VXY and NAZ re deposition designations Q/Cs.
09/30/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Conference with NAZ re deposition designations, trial boxes, and schedule for Sunday
09/30/2023	Abigail L. Robinson	ALR	1.3	\$325.00	\$422.50	Q/C the objections and exhibit keys in the deposition transcripts mini copies.
09/30/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review NAZ's index of the trial boxes.
09/30/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Email LitOps my EOD status updates.
09/30/2023	Cara E. Greene	CEG	5.0	\$950.00	\$4,750.00	Prep meeting with client, GSC (3.5); conference with GSC re Rowe direct and cross examination (1.3); correspondence with opposing counsel re opening visual aids and conference with GSC re same (.2).
09/30/2023	Gregory S. Chiarello	GSC	5.3	\$800.00	\$4,240.00	Client meeting (3.8); meeting with CEG re Rowe direct and opening (1.5).
09/30/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with ALR, SZG, and VXY re status updates re deposition designations, objections, and exhibit equivalents for deposition transcripts in advance of exchanging with opposing counsel to obtain defendant objections.
09/30/2023	Napoleon Zapata	NAZ	1.6	\$325.00	\$520.00	Prepare initial draft of trial box index of trial supplies and documents
09/30/2023	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Conference with ALR re status updates, pending trial prep projects, and workflow for QC of amended joint pretrial order and deposition transcripts with updated designations and objections.
09/30/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	QC deposition minusccripts in advance of attorney review and exchange of plaintiff objections with opposing counsel.
09/30/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re conference with ALR re status updates, pending trial prep projects, and workflow for QC of amended joint pretrial order and deposition transcripts with updated designations and objections.
09/30/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Correspondence with ALR, RRX, and VXY re workflow of QC of deposition transcripts and joint pretrial order
09/30/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Follow up conference with ALR, RRX, VXY, and TAM re updated workflow for preparing searches to pull documents for plaintiff trial exhibit list in advance of attorney review.
09/30/2023	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Grant access to nuix database, and prepare searches to pull documents for plaintiff trial exhibit list in advance of attorney review.
09/30/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated draft of trial playbook containing updated draft of Master Index of documents
09/30/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
09/30/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Prepare updated task list of upcoming trial prep projects and deadlines.
09/30/2023	Shira Gelfand	SZG	6.0	\$425.00	\$2,550.00	Correspondence with team (.2); begin drafting memo re evidentiary issues on week 1 (5.4); attention to deposition designations and objections and correspondence with opposing counsel re same (.2); attention to limiting instruction and correspondence with team re same (.1); correspondence with GSC re Florissi (.1).
09/30/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Correspondence with team re designation quality checks.
10/01/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Conference with NAZ and Correspondence with AZG re assignments statuses.
10/01/2023	Abigail L. Robinson	ALR	0.8	\$325.00	\$260.00	Construct the Backup Trial Binder.
10/01/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	REview Defendants exhibits Q/C from NAZ.
10/01/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review ECF docket.
10/01/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Create covers and index for Backup Trial binder.
10/01/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Begin to box up documents for the Courtroom during trial
10/01/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Q/C Florissi binder.
10/01/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Conference with NAZ re status of multiple pending assignments and next steps.
10/01/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Conference with SZG re status of JPTO, Designations, and Binders.
10/01/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review email from SZG re 3rd Amended JPTO.
10/01/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Correspondence to Trial Team re status of boxes for courtroom.
10/01/2023	Abigail L. Robinson	ALR	1.3	\$325.00	\$422.50	Q/C Deposition designations and counters.
10/01/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review Grannie outline and correspondence with SZG re same.
10/01/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with NAZ re status of Q/C.
10/01/2023	Abigail L. Robinson	ALR	1.4	\$325.00	\$455.00	Update materials for Florissi Binder, correspondence with SZG re same
10/01/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Update Grannie Binder per instructions from CEG.
10/01/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Conference with NAZ re deposition transcripts received from opposing counsel and process for Q/C
10/01/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review letter and prepare for ECF filing.
10/01/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Finalize and file Reply Letter. Correspondence with SZG re same.
10/01/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Q/C Plaintiff and Defendants Objections in Transcripts.
10/01/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Update LitOps ToDos and email team re same.
10/01/2023	Cara E. Greene	CEG	10.1	\$950.00	\$9,595.00	Work on finalizing Grannis outline; conference with D. Perrott re trial strategy and jury selection; review D. Perrott's notes re same; conference with GSC re same; mock opening with GSC and conference with same; conferences with SZG re Florissi deposition; correspondence with opposing counsel re opening visual aids and call re same, review trial schedule re witness availability, conferences with SZG, GSC.
10/01/2023	Gregory S. Chiarello	GSC	10.2	\$800.00	\$8,160.00	Team meeting with David Perrott (1.0); edit Harteau outline (.9); conferences with CEG re opening, witnesses (1.1); edit opening statement (4.4); opening run through with CEG and feedback session (2.2); telephone call with CEG, K. Gage re visual aids (.1); draft letter to Court re Grannis/Shaukat availability (.5).
10/01/2023	Napoleon Zapata	NAZ	0.9	\$325.00	\$292.50	Prepare updated draft of task list with updated list of pending trial prep projects
10/01/2023	Napoleon Zapata	NAZ	2.0	\$325.00	\$650.00	QC deposition transcripts with designations in comparison to initial draft of joint pretrial order updated by opposing counsel to identify inconsistencies in designations and objections.
10/01/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Conference with ALR re status updated and workflow for QC of deposition transcripts with designations in comparison to initial draft of joint pretrial order updated by opposing counsel to identify inconsistencies in designations and objections.
10/01/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re conference with ALR re status updated and workflow for QC of deposition transcripts with designations in comparison to initial draft of joint pretrial order updated by opposing counsel to identify inconsistencies in designations and objections.
10/01/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Correspondence with ALR, and SZG re JPTO error and correction
10/01/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Encrypt USB drives and log passwords in advance of upcoming trial
10/01/2023	Napoleon Zapata	NAZ	1.6	\$325.00	\$520.00	Continue QC of combined exhibit list in comparison to defendant exhibit list submitted with joint pretrial order
10/01/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare defendant exhibits for running text recognition in advance of upcoming trial

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Date	Timekeeper	Initials	Hours	Rates	Amount	Description
10/01/2023	Napoleon Zapata	NAZ	1.1	\$325.00	\$357.50	Continue packing trial supplies and documents to bring to trial in advance of upcoming trial
10/01/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Meeting with ALR re status updates, pending trial prep projects, and workflow for upcoming QC of joint pretrial order updated by opposing counsel in comparison to deposition transcripts with designations and objections.
10/01/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with DJ, and MBX re trial related programs to install on backup trial laptop in advance of upcoming trial.
10/01/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with HJ, RRX, DJ, and MBX re obtaining technology trial supplies in advance of upcoming trial
10/01/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Demo backup trial laptop to ensure that trial programs are installed and operating effectively
10/01/2023	Shira Gelfand	SZG	9.2	\$425.00	\$3,910.00	Continue drafting cross examination objectives (2.2); meeting with jury consultant (1.0); begin reviewing documents and drafting Florissi outline (4.6); attention to Florissi deposition logistics and documents (.2); attention to filing letter in SDNY (.2); edit and supplement JPTO and Appendix B (1.2);.
10/01/2023	Vincent Yang	VXY	0.8	\$325.00	\$260.00	Create Vardaman and Burdis video clips and playlists on trial laptop
10/01/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Review correspondences re Florissi deposition and status of designations.
10/02/2023	Abigail L. Robinson	ALR	0.9	\$325.00	\$292.50	Print and assemble documents for Florissi deposition.
10/02/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Process Dkt 321.
10/02/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Address issues with exhibit PX130. Create hard copies and bring to attorneys.
10/02/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Conference with VXY re PX130 and excel formatting.
10/02/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Update LitOps Assignment List.
10/02/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Email to HJ re setting up a courier for the delivery of boxes at Tech Set up
10/02/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Draft cover letter to Judge for hard copy 3rd Amended JPTO submissions.
10/02/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Coordinate with HJ for delivery of boxes at Tech Set up.
10/02/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Q/C cover letter to Judge.
10/02/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Coordinate logistics of delivery of boxes to Court for Tech Set Up.
10/02/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Add in objections to Vardaman mini transcript.
10/02/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Q/C deposition designations.
10/02/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Coordinate logistics of updated trial start date. Conference with LitOps and additional office support staff to halt plans for boxes delivery.
10/02/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with NAZ re designation status.
10/02/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Q/C objections in mini deposition transcripts.
10/02/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Coordinate with, SZG LitOps and additional support office support staff on updates to the timeline and priorities of assignments based on new start date for the trial.
10/02/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review and process ECF Document No. 322.
10/02/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Update Electronic Device Order for new Tech Set Up date and send to SZG.
10/02/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Update Electronic Device Order for Jury Consultant.
10/02/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Email O&G Calendar Team re updated trial dates.
10/02/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Update LitOps ToDos.
10/02/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Process Dkt 323.
10/02/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Correspondence with SZG, VXY, and Opposing Counsel's paralegal re call for discussion on deposition video clips
10/02/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Coordinate with SZG, JLM, VXY, and NAZ re confirmation of the Tech Set Up new date
10/02/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review email from NAZ re status of certified copies of transcripts.
10/02/2023	Gregory S. Chiarello	GSC	10.8	\$800.00	\$8,640.00	Florissi deposition (3.8); client meetings with team (2.5); team meeting (2.0); edit opening statement (2.5)
10/02/2023	Jennifer LaMarch	JLM	0.2	\$350.00	\$70.00	Docket/calendar control.
10/02/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Correspondence with SZG re meeting to hear opening statements.
10/02/2023	Makaria S. Yami	MSY	0.2	\$325.00	\$65.00	Save order and letter reply re motion to compel and trial dates to case files
10/02/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Save joint letter re trial dates to case files.
10/02/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated draft of task list with pending trial prep projects.
10/02/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence and meetings with VXY and RRX re issues with extracted text run on plaintiff trial exhibits
10/02/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare additional copy of plaintiff and defendant trial exhibits without extracted text for attorney review
10/02/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meetings with RRX and HJ re additional trial supplies, and boxing of trial supplies in advance of upcoming trial
10/02/2023	Napoleon Zapata	NAZ	1.7	\$325.00	\$552.50	Prepare and QC deposition minuscpts with all designations, exhibit equivalents, and objections in advance of attorney review.
10/02/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with DJ, MBX, and RRX re ordering IT office supplies in advance of upcoming trial
10/02/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Correspondence and meetings with RRX, AMW, and Veritext re official sealed and certified deposition transcripts
10/02/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Prepare updated binder containing deposition minuscpts with all designations, objections, and exhibit equivalents for attorney review.
10/02/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Replace old deposition minuscpts in witness binder with updated deposition minuscpts containing all designations, objections, and exhibit equivalents for attorney review.
10/02/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with SZG re replacing old deposition minuscpts in witness binder with updated deposition minuscpts containing all designations, objections, and exhibit equivalents for attorney review.
10/02/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Preparing and QC updated draft of deposition designation map with updated defendant objections
10/02/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Meeting with RRX, and VXY re status updates, trial supplies, and pending trial prep projects
10/02/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and compile notes re meeting with RRX, and VXY re status updates, trial supplies, and pending trial prep projects.
10/02/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Prepare updated draft of trial box index with information re additional trial supplies
10/02/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Begin preparing trial box stickers detailing box contents.
10/02/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Begin preparing courtesy copies of deposition transcripts containing all designations, objections, and exhibit equivalents in advance of sending to chambers.
10/02/2023	Shira Gelfand	SZG	0.0	\$0.00	\$0.00	Review article about case in Wired (.3)(no charge).
10/02/2023	Shira Gelfand	SZG	6.0	\$425.00	\$2,550.00	Prep for and attend Florissi deposition (5.1); debrief and team meeting (2.6); correspondence with court and attention to new trial date and logistics (.7); correspondence re joint proposed limiting instruction (.2).
10/02/2023	Vincent Yang	VXY	0.9	\$325.00	\$292.50	Format and print deposition documents re Florissi deposition
10/02/2023	Vincent Yang	VXY	0.6	\$325.00	\$195.00	Conference with RRX and NAZ re trial boxes and tech setup.
10/02/2023	Vincent Yang	VXY	1.6	\$325.00	\$520.00	Create new text clips re witness Eryurek and Wilson designations.
10/02/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Conference with RRX re trial agenda.
10/02/2023	Vincent Yang	VXY	4.0	\$325.00	\$1,300.00	Create Vardaman and Burdis outlines re exhibits displayed with designations.
10/03/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Conference with Opposing Counsel Associate and Paralegal re Trial Tech Set Up
10/03/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Review and send out notes from call with Opposing Counsel re Trial Technology
10/03/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Process transcripts of Florissi deposition.
10/03/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review email from Opposing Counsel's Paralegal re Trial Technology
10/03/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Review and update LitOps ToDos.
10/03/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Correspondence to HJ to coordinate updated delivery of the boxes to the Courthouse
10/03/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Review and edit labels for supply boxes. Correspondence with NAZ re same.
10/03/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Correspondence with RRX re Trial Tech and setting up a LitOps meeting.
10/03/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with VXY re Florissi official transcript
10/03/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Correspondence with VXY re meeting with Opposing Counsel about Trial Tech
10/03/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Correspondence with, VXY, Paul Hasting Associate, and Paralegal re the video clips and exhibits being presented at trial.

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
10/03/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Process ECF Document number 324 and 325.
10/03/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Edit Rowe Witness Scheduler.
10/03/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Conference with VXY, and Opposing Counsel's Associate and Paralegal re logistics of video clips and exhibits
10/03/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review updates to box labels.
10/03/2023	Abigail L. Robinson	ALR	1.0	\$325.00	\$325.00	Conference with RRX, NCX, VXY, and NAZ re status of ongoing assignments, discussing new assignments, and strategize for new schedule. Take, edit, and send out updated To Do List re same.
10/03/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Send follow up email to Magna Court Reporting re status of certified transcripts
10/03/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review email from Opposing Counsel's paralegal following up on logistics of Trial video and exhibit presentations
10/03/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with RRX re following up on Florissi depo
10/03/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review emails status updates on multiple pending assignments.
10/03/2023	Gregory S. Chiarello	GSC	7.9	\$800.00	\$6,320.00	Conference with SZG re letter to Court (.1); edit opening statement (2.5); meeting with CEG re expected Harteau testimony (1.0); meeting with CEG to discuss witness priority for exhibits (2.4); video conference with SZG, N. Harteau (1.1); meeting with CEG re trial preparation (.8).
10/03/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Save order re trial dates.
10/03/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Save filings re conference transcript.
10/03/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated draft of task list containing pending trial prep projects
10/03/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
10/03/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meetings with RRX and VXY re status updates and pending trial prep projects.
10/03/2023	Napoleon Zapata	NAZ	1.6	\$325.00	\$520.00	Continue preparing trial supplies in advance of upcoming trial
10/03/2023	Napoleon Zapata	NAZ	0.9	\$325.00	\$292.50	Prepare trial boxes for sealing and sending to trial.
10/03/2023	Napoleon Zapata	NAZ	1.5	\$325.00	\$487.50	Prepare updated draft of trial box index to track box contents.
10/03/2023	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Prepare trial box stickers of box contents in advance of sending boxes to upcoming trial
10/03/2023	Napoleon Zapata	NAZ	0.9	\$325.00	\$292.50	Conference with RRX, NCX, ALR, and VXY re status updates, pending trial prep projects, and upcoming deadlines in advance of upcoming trial.
10/03/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting with HJ, RRX, and DJ re preparing trial supplies in advance of upcoming trial
10/03/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare Patricia Florissi deposition transcript and videos for review and analysis in advance of upcoming trial
10/03/2023	Shira Gelfand	SZG	0.0	\$0.00	\$0.00	Correspondence re press (.2)(no charge).
10/03/2023	Shira Gelfand	SZG	8.5	\$425.00	\$3,612.50	Call with Paul Hastings re deposition videos and correspondence with team (.5); team meeting (.3); Review Florissi transcript and prepare letter to court to exclude testimony (5.3); prepare for and attend meeting with Harteau and attorney (1.8); edit examination outline and review meeting notes (.6);.
10/03/2023	Vincent Yang	VXY	1.5	\$325.00	\$487.50	Perform trial tech run through with CEG and RRX.
10/03/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Supplement trial laptop presentations.
10/03/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Attend to team correspondences re agendas.
10/03/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Correspondence with court reporter re timing of files; correspondence with team re preparing video designations
10/03/2023	Vincent Yang	VXY	0.4	\$325.00	\$130.00	Conference with opposing counsel re video designations and exhibits
10/03/2023	Vincent Yang	VXY	0.9	\$325.00	\$292.50	Conference with RRX, ALR, and NAZ re trial designations, technology, and logistics
10/03/2023	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Conference with CEG and GC re video designations.
10/03/2023	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Prepare designation scripts re non-live witnesses.
10/03/2023	Vincent Yang	VXY	1.2	\$325.00	\$390.00	Further prepare scripts for deposition testimony and consolidate overlapping designations; forward to CEG for review of exhibits.
10/04/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Conference with NAZ re number of trial days.
10/04/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Follow up with Court Reporters re Florissi deposition certified transcript
10/04/2023	Abigail L. Robinson	ALR	1.3	\$325.00	\$422.50	Update Witness-Trial schedule tracker.
10/04/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Q/C Witness-Trial scheduler tracker.
10/04/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Save Trackers to files.
10/04/2023	Abigail L. Robinson	ALR	0.7	\$325.00	\$227.50	Conference with RRX re Sanctions issue. Locate and contact Court reporter re requesting updated videos for Burdis and Vardaman.
10/04/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Correspondence with Chambers re Electronics's Device Order.
10/04/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Follow up correspondence with Court Reporter re updated Burdis and Vardaman deposition videos
10/04/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Circulate LitOps To Do List Team.
10/04/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Conference with RRX, TAM, NCX, VXY, and NAZ re trial logistics, designations, outlines, and scheduling
10/04/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Correspondence with SZG re trial tasks.
10/04/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Follow up correspondence with SZG re trial tasks.
10/04/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review email from Paul Hasting Team re JPTO, video presentation, and Florissi discovery exchange
10/04/2023	Gregory S. Chiarello	GSC	0.0	\$0.00	\$0.00	Review press statement (.1)(no charge).
10/04/2023	Gregory S. Chiarello	GSC	7.1	\$800.00	\$5,680.00	Revisions to Rowe direct examination outline (4.8); revise/practice opening statement (1.3); edit JPTO, conference with SZG re same (1.0).
10/04/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Review and compile notes re conference with RRX, NCX, ALR, and VXY re status updates, pending trial prep projects, and upcoming deadlines in advance of upcoming trial.
10/04/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meeting and correspondence with HJ and DJ re trial supplies for upcoming trial
10/04/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Prepare updated draft of trial box index with updated trial supplies and box numbers
10/04/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Begin preparing updated drafts of binder covers of binders copies going to Court in advance of trial
10/04/2023	Napoleon Zapata	NAZ	1.1	\$325.00	\$357.50	Begin preparing updated draft of deposition log with updated records of sealed and stamped official transcripts, and deposition video file sizes.
10/04/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with RRX re deposition video resolutions and file sizes in advance of upcoming trial
10/04/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meetings with AMW, and HJ re sealed and stamped official hard copies of deposition transcripts
10/04/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Meeting with ALR, VXY, RRX, TAM, and NCX re status updates, pending trial prep projects, and upcoming deadlines
10/04/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Prepare updated trial box stickers to account for additional trial supplies
10/04/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Correspondence and meetings with DJ, GSC, and HJ re additional trial supplies in advance of upcoming trial
10/04/2023	Naomi Campusano	NCX	0.3	\$350.00	\$105.00	Attend team huddle re updates.
10/04/2023	Robert S. Rivera	RRX	0.6	\$350.00	\$210.00	Conference with TAM, ALR, NCX, VXY and NAZ.
10/04/2023	Shira Gelfand	SZG	0.0	\$0.00	\$0.00	Correspondence with client re press (.1)(no charge).
10/04/2023	Shira Gelfand	SZG	3.9	\$425.00	\$1,657.50	Calls with GSC and CEG; follow up emails re same (1.2); edit JPTO (.2); Continue drafting Florissi letter and conduct research re same (1.7); correspondence with paralegals re tasks (.2); correspondence with jury consultant (.1); review documents and communications re Def's discovery request (.3); correspondence re linkedin campaign (.1);.
10/04/2023	Tracee A. Manettas	TAM	0.6	\$350.00	\$210.00	Attend trial prep meeting with RRX, VXY, ALR and NAZ.
10/04/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Conference with RRX re trial technology.
10/04/2023	Vincent Yang	VXY	0.6	\$325.00	\$195.00	Correspondence with opposing counsel re trial deposition video play through methods
10/04/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspondence with court reporter re file format of transcript to be delivered
10/04/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Conference with NCX and RRX re trial laptop errors.
10/04/2023	Vincent Yang	VXY	0.4	\$325.00	\$130.00	Correspondence with CEG re video designations capabilities.
10/04/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Correspondence with opposing counsel re further ideas re playing video designations and exhibits
10/04/2023	Vincent Yang	VXY	0.7	\$325.00	\$227.50	Conference with ALR, NAZ, and RRX re trial logistics, designations, outlines, and scheduling
10/04/2023	Vincent Yang	VXY	1.1	\$325.00	\$357.50	Download Florissi transcript and add to trial laptop and import to trial software
10/04/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Apply privacy screens to monitors.
10/05/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with SZG re outstanding questions for attorneys.

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
10/05/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review correspondence between Opposing Counsel and our office re designations, video presentation, and Florissi productions.
10/05/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Download Burris and Vardaman depositions videos in lower resolution
10/05/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Coordinate with SZG and VXY to update designations and ensure all copies are correct and switched out
10/05/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Correspondence with Opposing Counsel re designations updates.
10/05/2023	Abigail L. Robinson	ALR	1.0	\$325.00	\$325.00	Coordinate with NAZ to update the court copies of covers and spines for Plaintiff's Exhibits, Defendant's Exhibits, and Deposition Transcripts.
10/05/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Coordinate with SZG and NCX re new production.
10/05/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Discussion Florissi Nuix production with RRX. Correspondence with NCX sand NAZ re next steps
10/05/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review PACER filing options ahead of the 3rd Amended JPTO filing.
10/05/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Updated LitOps To Do List.
10/05/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Coordinate with VXY, NAZ, and NCX re Nuix production
10/05/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Conference with SZG, RRX, VXXY, and NAZ re status of 3rd Amended JPTO, Tech Setup, and Trial Presentation
10/05/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Coordinate with NAZ re binder covers and printing.
10/05/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Correspondence with SZG re GSC PACER Account.
10/05/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Correspondence to Trial Team re delivery and content of boxes.
10/05/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Begin to update Burdis and Vardaman witness binders.
10/05/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Conference with RRX, VXY, and NAZ re status of multiple assignments and preparation for next steps
10/05/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Finalize updates to Burdis and Vardaman binders and deposition transcript binder
10/05/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Draft FTP of Plaintiff's 12th Production and send to SZG for review
10/05/2023	Abigail L. Robinson	ALR	2.0	\$325.00	\$650.00	Update 3rd Amended JPTO Appendix and PX104 and PX152. Coordinate with SZG and VXY re same
10/05/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Finalize and send FTP to Opposing Counsel with Plaintiff's 12th Production
10/05/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Status update email to LitOps Team.
10/05/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	End of day check in with VXY and NAZ.
10/05/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Print and assemble PX104A-C and PX152 for courtesy copies to Court.
10/05/2023	Gregory S. Chiarello	GSC	11.5	\$800.00	\$9,200.00	Meetings with CEG re settlement strategy, telephone call with client re same (1.8); team meeting (.7); revise/practice opening statement (4.2); opening run-through with CEG and feedback discussion (1.4); review documents for Rowe cross examination preparation (1.2); conferences with SZG (.5); conferences with CEG (1.7).
10/05/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Begin preparing updated drafts of binder covers of binders copies going to Court in advance of trial
10/05/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Continue preparing updated drafts of binder covers of binders copies going to Court in advance of trial
10/05/2023	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Correspondence and meetings with CC, DJ, RRX, and HJ re additional trial supplies in advance of upcoming trial
10/05/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated draft of trial box index in advance of attorney review to send trial supplies to Court
10/05/2023	Napoleon Zapata	NAZ	1.1	\$325.00	\$357.50	Prepare daily trial manuscript binders in advance of upcoming trial
10/05/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Update April Beaupain witness binder in advance of upcoming trial
10/05/2023	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Meeting with RRX, SZG, ALR, and VXY re supplies to send to court, trial tech demo, and upcoming third amended joint pretrial order filing.
10/05/2023	Napoleon Zapata	NAZ	3.5	\$325.00	\$1,137.50	Begin preparing courtesy copies of third amended joint pretrial order, deposition transcripts with designations and objections, and additional exhibits in advance of sending to Chambers,.
10/05/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Meeting with RRX, ALR, and VXY re status updates and workflow for finalizing supplies to send to court, trial tech demo, and preparing upcoming third amended joint pretrial order for filing.
10/05/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and compile notes re meeting with RRX, ALR, and VXY re status updates and workflow for finalizing supplies to send to court, trial tech demo, and preparing upcoming third amended joint pretrial order for filing.
10/05/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Conference and correspondence with NCX re ingestion of client documents and preparation of production 12
10/05/2023	Napoleon Zapata	NAZ	2.7	\$325.00	\$877.50	Finalize trial supply boxes in advance of sealing and sending to court for upcoming trial
10/05/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Review and compile notes re meeting with RRX, SZG, ALR, and VXY re supplies to send to court, trial tech demo, and upcoming third amended joint pretrial order filing.
10/05/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Meetings with HJ, RRX, SZG, VXY, and ALR re final review of trial supply boxes in advance of numbering, sealing, and sending them to court for upcoming trial.
10/05/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence with HJ, RRX, VXY, and ALR re final review of trial supply boxes in advance of numbering, sealing, and sending them to court for upcoming trial.
10/05/2023	Naomi Campusano	NCX	0.2	\$350.00	\$70.00	Meet with NAZ re document review in Nuix.
10/05/2023	Naomi Campusano	NCX	0.8	\$350.00	\$280.00	Ingest client documents into Nuix and correspond with team re same.
10/05/2023	Naomi Campusano	NCX	1.2	\$350.00	\$420.00	Prepare plaintiff's production in Nuix and correspond with team re same
10/05/2023	Robert S. Rivera	RRX	0.5	\$350.00	\$175.00	Conference with SZG, ALR, VXY and NAZ regarding status of third amended JPTO, tech setup and trial presentation
10/05/2023	Shira Gelfand	SZG	9.9	\$425.00	\$4,207.50	Edit Florissi letter (1.3); team meeting (.4); correspondence with opposing counsel re JPTO and Appx B (.3); attention to video notations and exhibits, review VXY designations and callouts for Burdis and Vardaman (3.8); call with opposing counsel and attention to edits to JPTO, finalize and edit same (.8); meeting with CEG re matter (.5); call with expert (.2); attention to editing appx A (.5); attention to Florissi production - review documents, remove A/C correspondence, correspondence with paralegals (.6); meeting with lit ops (.5); meeting with GSC (.1); review CEG edits to letter and review re same, edit and include citations (1.1).
10/05/2023	Vincent Yang	VXY	0.8	\$325.00	\$260.00	Update witness transcripts re updates to designations.
10/05/2023	Vincent Yang	VXY	2.7	\$325.00	\$877.50	Prepare spreadsheet detailing video designation exhibits and callouts for SZG review
10/05/2023	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Conference with ALR, NAZ, and SZG re tech walk through, production, and pretrial order
10/05/2023	Vincent Yang	VXY	0.6	\$325.00	\$195.00	Conference with RRX, ALR, and NAZ re tech walkthrough, pretrial order, courtesy copies, and outlines
10/05/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Prepare box of electronics and electronic device order to courthouse
10/05/2023	Vincent Yang	VXY	2.0	\$325.00	\$650.00	Import videos of depositions into TrialDirector and clip videos
10/05/2023	Vincent Yang	VXY	1.8	\$325.00	\$585.00	Make Plaintiff exhibit updates and update internal binders re exhibit updates
10/06/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Begin to set up USB drive for courtesy copies.
10/06/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Continue to conference with MSY re updates to processes and strategy for improving number of targets
10/06/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Q/C PX104A-C and PX152 and draft FTP message to opposing counsel.
10/06/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Location and print out document requested by CEG.
10/06/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Finalize and send FTP transfer of PX104A-C and PX152 to opposing counsel
10/06/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review yesterday's email from opposing counsel re status of 3rd Amended Joint Pre-trial Order
10/06/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Conference with RRX re status of Video presentation and filing of Joint Amended Pretrial Order
10/06/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review email correspondence from Opposing Counsel with updated JPTO.
10/06/2023	Abigail L. Robinson	ALR	1.5	\$325.00	\$487.50	Review Florissi letter and pull and label exhibits from transcript. Correspondence with Court Reporting company to resolve formatting issues with transcript. Correspondence with SZG re same.
10/06/2023	Abigail L. Robinson	ALR	0.7	\$325.00	\$227.50	Finalize 3rd Amended JPTO for filing.
10/06/2023	Abigail L. Robinson	ALR	1.5	\$325.00	\$487.50	Update and Q/C exhibits to Florissi letter. Correspondence with VXY re Q/C. Correspondence with SZG re same. Finalize Florissi letter and coordinate with JLM to get filed on ECF.
10/06/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Conference with CEG, GSC, SZG, RRX, VXY, and NAZ to discuss LitOps Weekend assignments.
10/06/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Conference with RRX, VXY, and NAZ post meeting with attorneys to divide up assignments.
10/06/2023	Abigail L. Robinson	ALR	0.7	\$325.00	\$227.50	Upload Third Amended JPTO materials to SDNY portal and USB drive. Email to Chambers with exhibit list
10/06/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Update LitOps schedule and assignment tracker. Email team re same.
10/06/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Daft and send FTP file to Opposing Counsel.

Rowe v. Google LLC
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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
						Revise/practice opening statement (1.8); case strategy meetings with CEG (1.2); jury selection note form (.2); conference with SZG (1.1); Rowe cross preparation (.5); revise Rowe direct examination outline (1.0); opening run through meeting and feedback session (1.8); draft Breslow examination outline (1.0).
10/06/2023	Gregory S. Chiarello	GSC	7.6	\$800.00	\$6,080.00	
10/06/2023	Hector Jacome	HJ	1.0	\$150.00	\$150.00	Came in early to prepare boxes for court, 500 Pearl Street. Left office early to deliver 17 boxes for trial
10/06/2023	Jennifer LaMarch	JLM	0.2	\$350.00	\$70.00	File 3rd amended JPTO.
10/06/2023	Jennifer LaMarch	JLM	0.2	\$350.00	\$70.00	File letter re Florissi testimony.
10/06/2023	Makaria S. Yami	MSY	1.0	\$325.00	\$325.00	Hear and provide feedback on opening trial statement.
10/06/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and organize emails re upcoming trial prep projects, status updates, and meeting scheduling
10/06/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated draft of task list containing pending trial prep projects
10/06/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with HJ re additional trial supplies in advance of upcoming trial
10/06/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with SZG, ALR, and VXY re preparing joint pretrial order in advance of filing
10/06/2023	Napoleon Zapata	NAZ	0.9	\$325.00	\$292.50	Run redlines, and prepare joint pretrial order in advance of filing
10/06/2023	Napoleon Zapata	NAZ	1.5	\$325.00	\$487.50	Continue preparation and QC of courtesy copies of deposition transcripts with designations, objections, and exhibit equivalents, and third amended joint pretrial order.
10/06/2023	Napoleon Zapata	NAZ	1.2	\$325.00	\$390.00	Full team meeting, and litops only meeting with RRX, VXY, and ALR re pending trial prep projects, weekend scheduling, and court scheduling.
10/06/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Prepare updated draft of trial playbook with updated contacts tab.
10/06/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Review and compile notes re full team meeting, and litops only meeting with RRX, VXY, and ALR re pending trial prep projects, weekend scheduling, and court scheduling.
10/06/2023	Naomi Campusano	NCX	2.8	\$350.00	\$980.00	Import defendant's production in Nuix and correspond with team re same
10/06/2023	Robert S. Rivera	RRX	0.6	\$350.00	\$210.00	Conference with CEG, GSX, SZG, ALR, VXY and NAZ regarding LitOps weekend assignments.
10/06/2023	Shira Gelfand	SZG	9.4	\$425.00	\$3,995.00	Continue drafting Harteau outline and review GSC notes from meeting (.8); Rowe mock opening and debrief (1.1); meetings with CEG and GSC (1.2); attention to finalizing and filing JPTO and Florissi letter (3.7); attention to Burdis video and exhibits (.2); team meeting and follow up correspondence re courtesy copies to court and other open items (1.6); begin drafting letter to court re Vardaman appearance (.8).
10/06/2023	Shira Gelfand	SZG	2.0	\$212.50	\$425.00	Travel to court and set up technology and boxes, travel to office.
10/06/2023	Vincent Yang	VXY	2.6	\$325.00	\$845.00	Attend to tech walk-through at courthouse and test equipment.
10/06/2023	Vincent Yang	VXY	0.9	\$325.00	\$292.50	Review video clips on Sanction software and export playlist for CEG review.
10/06/2023	Vincent Yang	VXY	0.7	\$325.00	\$227.50	Attend to amended final pretrial order.
10/06/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Prepare witness N. Harteau amended subpoena.
10/06/2023	Vincent Yang	VXY	0.5	\$325.00	\$162.50	Finalize third amended pretrial order.
10/06/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspondence with court reporter re synced file format.
10/06/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Download production from Defendants re Florissi.
10/06/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Perform quality check re letter re Florissi.
10/06/2023	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Conference with GC, CEG, SZG, RRX, ALR, and NAZ re pretrial agenda, binder updates, indexes, and exhibits
10/06/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Load DVT file formats re transcripts into second trial laptop
10/06/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Forward Eryurek and Wilson scripts to attorneys.
10/06/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Update exhibit index per CEG edits.
10/07/2023	Abigail L. Robinson	ALR	1.3	\$325.00	\$422.50	Coordinate with SZG, CEG, GSC, and RRX for finalizing and filing of Vardaman letter
10/07/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Review multiple emails on status reports of assignments and new assignments for tomorrow. Set up team check in to divide up assignments.
10/07/2023	Gregory S. Chiarello	GSC	9.6	\$800.00	\$7,680.00	Client meeting (3.0); edits to Vardaman letter (1.1); edits to Rowe direct outline, add exhibit directions for Vincent (1.9); strategy conferences with CEG re witness strategy, settlement (2.5); draft Breslow examination outline, conference with CEG re same (1.1).
10/07/2023	Lindsay M. Goldbrum	LMG	0.1	\$450.00	\$45.00	Telephone conference with GSC re research.
10/07/2023	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Review defendant 10/6/23 production and Nuix import to identify issues with documents missing from Nuix import
10/07/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Correspondence with SZG, CEG, and GSC re issues with documents missing from defendant 10/7/23 production imported to Nuix, and workaround to review on Ydrive.
10/07/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare documents from 10/7/23 defendant production for sending to client
10/07/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Correspondence with DXS, NCX and RRX re issues with documents missing from defendant 10/7/23 production imported to Nuix, and workaround to review documents from zip file on Ydrive.
10/07/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated draft of task list.
10/07/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare defendant's trial exhibits for sending to client for review in advance of trial
10/07/2023	Shira Gelfand	SZG	6.3	\$425.00	\$2,677.50	Draft letter to court re Vardaman; correspondence with team and attention to production and trial prep
10/07/2023	Vincent Yang	VXY	1.7	\$325.00	\$552.50	Update exhibit index re relevant witnesses and color coding.
10/08/2023	Abigail L. Robinson	ALR	1.2	\$325.00	\$390.00	Meet with RRX, VXY, and NAZ re new assignments. Meet with NAZ to train him on putting transcripts into the outlines.
10/08/2023	Abigail L. Robinson	ALR	0.8	\$325.00	\$260.00	Update Breslow outline with deposition transcript lines and color coding
10/08/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Update Grannis outline with color coding.
10/08/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Finalize update Breslow outline with deposition transcript lines and color coding. Upload to FV and email GSC
10/08/2023	Abigail L. Robinson	ALR	0.7	\$325.00	\$227.50	Update Vardaman outline with deposition transcript lines and color coding
10/08/2023	Abigail L. Robinson	ALR	0.8	\$325.00	\$260.00	Organize Trial exhibits by witness.
10/08/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Q/C updates of transcripts line and color coding to the Shaukat outline
10/08/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Conference with NAZ re status of the production.
10/08/2023	Abigail L. Robinson	ALR	0.8	\$325.00	\$260.00	Q/C the additions of transcript lines and exhibit color coding to the Shaukat outline
10/08/2023	Abigail L. Robinson	ALR	1.7	\$325.00	\$552.50	Coordinate with VXY and NAZ to process client documents and produce to Defendants
10/08/2023	Abigail L. Robinson	ALR	2.0	\$325.00	\$650.00	Cross reference Exhibit by Witness against outlines. Update files. Upload materials to Filevine. Q/C and advise NAZ of Q/C.
10/08/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Email to SZG re filing.
10/08/2023	Abigail L. Robinson	ALR	1.2	\$325.00	\$390.00	Update Breslow outline adding in updated deposition transcripts.
10/08/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review Witness by Exhibits individual-ed indexes for needed updates based on objection updates
10/08/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Review and process Defendant's Letter at ECF Document number 330.
10/08/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Update Vardaman outline with new transcript lines and exhibit color coding
10/08/2023	Gregory S. Chiarello	GSC	6.2	\$800.00	\$4,960.00	Draft Breslow examination outline and review Breslow deposition (3.2); correspondence re new production (.3); revise, practice opening statement (2.2); review Shaukat outline (.5).
10/08/2023	Lindsay M. Goldbrum	LMG	1.0	\$450.00	\$450.00	Correspondence with GSC re document review (.1); review documents for production (.9)
10/08/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Conference with RRX, ALR, and VXY re pending trial prep projects, division of labor, and status updates
10/08/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Follow up conference with ALR re workflow for adding in deposition lines into witness examination outlines, and color coding noted trial exhibits.
10/08/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re follow up conference with ALR re workflow for adding in deposition lines into witness examination outlines, and color coding noted trial exhibits.
10/08/2023	Napoleon Zapata	NAZ	1.9	\$325.00	\$617.50	Add in deposition lines into witness examination outlines, and color code noted trial exhibits
10/08/2023	Napoleon Zapata	NAZ	0.9	\$325.00	\$292.50	Correspondence with GSC, CEG, SZG, ALR and VXY re messages from client to produce to opposing counsel
10/08/2023	Napoleon Zapata	NAZ	0.8	\$325.00	\$260.00	Begin preparing ingestion of messages from client to Nuix in advance of producing to opposing counsel
10/08/2023	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Prepare messages from client for producing to opposing counsel, and QC production
10/08/2023	Napoleon Zapata	NAZ	1.6	\$325.00	\$520.00	Update and QC exhibits for each witness in advance of upcoming trial.

Rowe v. Google LLC
Case No. 19-cv-08655 (JHR)
Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
10/08/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with VXY and ALR re updates and QC of exhibits for each witness in advance of upcoming trial
10/08/2023	Shira Gelfand	SZG	5.5	\$425.00	\$2,337.50	Correspondence with team; review of client documents; continue drafting Harteau outline; draft evidentiary issues by day;.
10/08/2023	Shira Gelfand	SZG	0.8	\$425.00	\$340.00	Review Def's filing; correspond with team re same.
10/08/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Review witness scripts on textmap.
10/08/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Conference with RRX, ALR, and NAZ re distribution of trial agenda items
10/08/2023	Vincent Yang	VXY	0.9	\$325.00	\$292.50	Quality check Eryurek and Wilson designations and confirm scripts.
10/08/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Quality check Breslow outline re transcript cites and exhibits.
10/08/2023	Vincent Yang	VXY	1.5	\$325.00	\$487.50	Stamp and produce production to Defendant; prepare certificate of service and cover letter re same
10/08/2023	Vincent Yang	VXY	1.1	\$325.00	\$357.50	Quality check witness outlines.
10/08/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Prepare word versions of non-live witness scripts.
10/08/2023	Vincent Yang	VXY	0.4	\$325.00	\$130.00	Update objections in index of exhibits.
10/08/2023	Vincent Yang	VXY	2.9	\$325.00	\$942.50	Prepare trial laptop presentations per outlines and clip transcripts
10/08/2023	Vincent Yang	VXY	2.9	\$325.00	\$942.50	Prepare trial laptop presentations re outlines.
10/09/2023	Abigail L. Robinson	ALR	11.6	\$325.00	\$3,770.00	Trial Preparation: Conference with Attys (.7), Conference with LitOps (.3), Update Exhibits and Index List (1.8), Update LitOps ToDos (.2), Quality Control exhibits by witness and update Physical Witness Binders (4.1), Second meeting with Attys (.5), Update color coding in witness outlines and quality control transcript lines (1.9), Update cover letter and USB for courtesy copies (.7), Coordinate with LitOps for physical document delivery to Courthouse (.4), create USBs for Attys (.4), create index for Backup Trial Binder (.2), Conference with RRX re assignments (.4).
10/09/2023	Gregory S. Chiarello	GSC	9.5	\$800.00	\$7,600.00	Practice opening statement (1.0); team meetings re witnesses, exhibits and objections, jury selection, witness outlines and strategy; Vardaman live testimony; Florissi exhibits (7.1); edits to Rowe direct examination outline (1.4).
10/09/2023	Lindsay M. Goldbrum	LMG	5.6	\$450.00	\$2,520.00	Research re supervisor compensation (2.9); draft letter to court re P108 and research re same (2.7)
10/09/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting and correspondence with CEG, RRX, and VXY re upcoming team meeting and availability
10/09/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meetings with ALR and RRX re status updates, pending trial prep projects, and upcoming deadlines
10/09/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Prepare updated draft of task list containing trial prep projects
10/09/2023	Napoleon Zapata	NAZ	3.8	\$325.00	\$1,235.00	Prepare, assemble, and QC updated trial binders for attorney review in advance of upcoming trial
10/09/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with GSC, RRX, and ALR re preparation, assembly, and QC of updated trial binders for attorney review in advance of upcoming trial.
10/09/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Initial meeting with GSC, CEG, VXY, ALR, and RRX re status updates, pending trial prep projects, and upcoming deadlines in advance of trial.
10/09/2023	Napoleon Zapata	NAZ	2.7	\$325.00	\$877.50	Prepare updated draft of Tariq Shaukat and Stuart Vardaman with updated deposition designation lines and color coded trial exhibit call outs for attorney review in advance of upcoming trial.
10/09/2023	Napoleon Zapata	NAZ	2.9	\$325.00	\$942.50	Prepare, finalize, and QC trial boxes containing court courtesy copies of deposition transcripts, plaintiff exhibit list for Judge Rearden, and additional plaintiff trial exhibits in advance of sending to court for upcoming trial.
10/09/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Follow up meeting with GSC, CEG, VXY, ALR, and RRX re status updates, pending trial prep projects, and upcoming deadlines in advance of trial.
10/09/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meetings with ALR re updates to witness binder, updates to trial binders, and finalizing trial boxes containing court courtesy copies.
10/09/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence w. CEG, SZG, and GSC re passwords for encrypted USBs in advance of upcoming trial
10/09/2023	Robert S. Rivera	RRX	0.7	\$350.00	\$245.00	Conference with CEG, GSC, SZG, ALR, VXY and NAZ regarding logistics, binder updates, script updates and outlines
10/09/2023	Shira Gelfand	SZG	8.3	\$425.00	\$3,527.50	Continue drafting evidentiary issues document by day; meeting with team; trial prep.
10/09/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Conference with CEG, GC, RRX, ALR, and NAZ re trial agenda.
10/09/2023	Vincent Yang	VXY	1.8	\$325.00	\$585.00	Update Eryurek and Wilson scripts for clarity.
10/09/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Quality check Breslow outline.
10/09/2023	Vincent Yang	VXY	0.6	\$325.00	\$195.00	Conference with RRX re run through of trial technology.
10/09/2023	Vincent Yang	VXY	0.7	\$325.00	\$227.50	Conference with CEG, GC, SZG, RRX, ALR, and NAZ re logistics, binder updates, script updates, and outlines
10/09/2023	Vincent Yang	VXY	1.4	\$325.00	\$455.00	Review witness Burdis video re exhibits and testimony.
10/09/2023	Vincent Yang	VXY	0.4	\$325.00	\$130.00	Update witness Wilson script.
10/09/2023	Vincent Yang	VXY	0.7	\$325.00	\$227.50	Update indexes and exhibit lists.
10/09/2023	Vincent Yang	VXY	0.4	\$325.00	\$130.00	Update letters and orders binder.
10/10/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Assemble Witness Materials.
10/10/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review and save correspondence from SZG re stipulations.
10/10/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Assemble materials for witnesses.
10/10/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Reorganize conference room Jay.
10/10/2023	Abigail L. Robinson	ALR	1.0	\$325.00	\$325.00	Update Comprehensive Timeline.
10/10/2023	Abigail L. Robinson	ALR	0.7	\$325.00	\$227.50	Complete update to Comprehensive Timeline and quality control updates.
10/10/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Review trial schedule and set up calendar entries for lunch breaks.
10/10/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Start to draft questions for attorneys about after trial To Do List.
10/10/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Conference with SZG post trial on assignments and schedule.
10/10/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Research and send email about lunch options.
10/10/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Review Breslow and Shaukat outlines for additional deposition transcripts
10/10/2023	Cara E. Greene	CEG	15.2	\$950.00	\$14,440.00	Trial day 1 and prepare for trial day 2.
10/10/2023	Cara E. Greene	CEG	1.0	\$475.00	\$475.00	Travel to and from courthouse.
10/10/2023	Gregory S. Chiarello	GSC	14.1	\$800.00	\$11,280.00	Trial: Day 1 (8.8); preparation work for Day 2 (5.3)
10/10/2023	Hector Jacome	HJ	1.5	\$75.00	\$112.50	Travel from office to court house, arrive in early to prepare boxes for trial day at 500 Pearl Street
10/10/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Correspondence with RRX and TAM re availability.
10/10/2023	Makaria S. Yami	MSY	0.5	\$325.00	\$162.50	Save and organize orders, letters requests, and responses to case files.
10/10/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with HJ, RRX, ALR, and VXY re sealing of trial supply boxes to bring to Court, and trial box index
10/10/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with RRX re updates to trial box index of trial supplies brought to Court
10/10/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence and meetings with RRX and ALR re location of trial supplies brought to Court
10/10/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Prepare updated draft of trial box index.
10/10/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated draft of task list with currently pending trial prep projects
10/10/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Pull and print pltf ex. 72 for attorney review.
10/10/2023	Napoleon Zapata	NAZ	1.0	\$325.00	\$325.00	Review letter to identify cited cases, and pull from from Lexis.
10/10/2023	Napoleon Zapata	NAZ	1.6	\$325.00	\$520.00	Prepare and assemble courtesy copes of cases cited in letter re pltf ex. 108 for sending to court
10/10/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Calls and meetings with SZG and HJ re boxes of additional trial supplies and courtesy copies to send to Court for 10/11/23.
10/10/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Prepare updated draft of trial box index with contents of additional boxes sent to court, and finalize boxes for sending to court for 10/11/23.
10/10/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Correspondence with RRX, SZG, HJ, ALR, and VXY re additional trial boxes to send to court for 10/11/23
10/10/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meeting with SZG, TAM, ALR, and RRX re status updates, additional trial prep projects, and upcoming deadlines
10/10/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with SZG re preparation and assemble of courtesy copes of cases cited in letter re pltf ex. 108 for sending to court.
10/10/2023	Shira Gelfand	SZG	15.6	\$425.00	\$6,630.00	Prep for, attend trial (8.5); prep for next day (7.1).
10/10/2023	Vincent Yang	VXY	2.1	\$325.00	\$682.50	Review and prepare outlined exhibits re witnesses in presentation laptop and backup

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
10/10/2023	Vincent Yang	VXY	8.5	\$325.00	\$2,762.50	Attend jury trial re jury selection and Plaintiff direct examination
10/10/2023	Vincent Yang	VXY	0.6	\$325.00	\$195.00	Prepare new electronic request order.
10/10/2023	Vincent Yang	VXY	0.6	\$162.50	\$97.50	Commute from courthouse to office with trial supplies.
10/10/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Order video file formats re Plaintiff U. Rowe depositions.
10/11/2023	Abigail L. Robinson	ALR	4.9	\$325.00	\$1,592.50	Conference with Attorneys re assignments, (.2), conference with VXY and NAZ re assignments and schedule (.2), emails with opposing counsel's office re transcripts (.3), review Burdis depositions and exhibits for objections and report back to Attorneys per their request, (.6), coordinate getting attorneys the list of admitted exhibits (.2), create Attorney copies of deposition transcripts (2), pull cites from Lucas Deposition (.6), create Performance Evaluation Binder (.5), conference with Attorneys re trial testimony and pending letter. (.3).
10/11/2023	Cara E. Greene	CEG	13.8	\$950.00	\$13,110.00	Trial Day 2 and prepare for trial day 3.
10/11/2023	Cara E. Greene	CEG	1.0	\$475.00	\$475.00	Travel to and from courthouse.
10/11/2023	Gregory S. Chiarello	GSC	17.2	\$800.00	\$13,760.00	Trial: Day 2 (8.1); preparation work for Day 3, including letter to court on evidentiary issues (9.1)
10/11/2023	Hector Jacome	HJ	1.0	\$75.00	\$75.00	Travel from office to courthouse at 500 Pearl Street, transport boxes very early in the morning
10/11/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
10/11/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and compile notes re meeting with SZG, TAM, ALR, and RRX re status updates, additional trial prep projects, and upcoming deadlines.
10/11/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Meetings and correspondence with TAM, SZG, CEG, GSC, HJ, and DMC re trial supplies, and ordering lunch
10/11/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Meeting with RRX re rerunning of production 12 re Nuix discovery
10/11/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with ALR and VXY re issues with daily trial transcript for 10/10/23
10/11/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Order trial supplies in advance of upcoming trial.
10/11/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meetings with ALR, VXY, CEG, and GSC re pending trial prep projects, status updates, and upcoming deadlines
10/11/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re meetings with ALR, VXY, CEG, and GSC re pending trial prep projects, status updates, and upcoming deadlines.
10/11/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Calls and correspondence with HJ, RRX, ALR, and VXY re additional trial supply boxes to bring to court
10/11/2023	Shira Gelfand	SZG	18.2	\$425.00	\$7,735.00	Attend trial (8.5); post-trial work for next day (9.7).
10/11/2023	Vincent Yang	VXY	3.5	\$325.00	\$1,137.50	Annotate outlines re callouts and prepare deposition testimony clips and exhibits for presentation
10/11/2023	Vincent Yang	VXY	8.5	\$325.00	\$2,762.50	Attend trial re examinations of Rowe and Shuakat.
10/11/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Download Rowe deposition DVT video formats.
10/11/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Mark admitted exhibits on presentation software.
10/11/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Conference with CEG, GC, NAZ, and ALR re trial agenda.
10/11/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Circulate admitted exhibits and Burdis script to team.
10/12/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Pull requested Burdis deposition pages.
10/12/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Email instructions to HJ and VXY re items to Court and organizing
10/12/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Finalize and file letter at ECF Document number 331.
10/12/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Process filed copy of ECF Document number 331.
10/12/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Correspondence with SZG, RRX, VXY, and NAZ re multiple items that need to be brought to Court
10/12/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Conference with NAX re status of documents going to Court and process to enter the building
10/12/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Save minute entry and ECF Document number 332.
10/12/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Correspondence with PR Team re status of trial.
10/12/2023	Abigail L. Robinson	ALR	1.3	\$325.00	\$422.50	Review Trial transcripts to update the admitted exhibit list.
10/12/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Conference with RRX re status of trial and schedule.
10/12/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with the PR Team re Trial schedule.
10/12/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Conference with GSC re assignment schedule.
10/12/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Circulate the updated admitted exhibit list.
10/12/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Conference with NAZ re assignments and schedule.
10/12/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Process daily transcript and send to Attorneys and LitOps. Review VXY's updated admitted exhibit excel.
10/12/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Finalize and file letter re Jennifer Bennett.
10/12/2023	Abigail L. Robinson	ALR	0.8	\$325.00	\$260.00	Research cites from letter re Jennifer Bennett.
10/12/2023	Cara E. Greene	CEG	15.4	\$950.00	\$14,630.00	Trial Day 3 and prepare for trial day 4.
10/12/2023	Cara E. Greene	CEG	1.0	\$475.00	\$475.00	Travel to and from courthouse.
10/12/2023	Gregory S. Chiarello	GSC	14.6	\$800.00	\$11,680.00	Trial: Day 3 (7.3); preparation work for Day 4, including letter to court re evidentiary issues (7.3)
10/12/2023	Hector Jacome	HJ	1.0	\$75.00	\$75.00	Travel from office to courthouse, transport boxes early in the morning
10/12/2023	Jennifer Davidson	JDX	0.2	\$425.00	\$85.00	Conference with LMG re: researching for letter motion.
10/12/2023	Jennifer Davidson	JDX	0.9	\$425.00	\$382.50	Research re: J. Bennett evidence.
10/12/2023	Lindsay M. Goldbrum	LMG	6.1	\$450.00	\$2,745.00	Attend trial (4.0); draft letter to court re Jennifer Bennett (1.9); telephone conference with JDX re letter to court (.1); correspondence with SZG re letter to court (.1).
10/12/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with AMW, ALR, SZG, RRX, and HJ re documents to print and bring to Court for attorney review
10/12/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Prepare Grannis Binder, trial manuscripts, Kevin Lucas deposition cites, Will Grannis outline, and trial supplies for sending to court.
10/12/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review plaintiff exhibits, and Prepare pltf ex. 39 for printing and sending to the Court
10/12/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review plaintiff trial exhibits, and correspondence with SZG re preparing pltf ex. 39 for sending to the Court
10/12/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meetings with RRX, VXY, and ALR re status updates, and pending trial prep projects.
10/12/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated drafts of trial box stickers in advance of sending addition trial supplies to court
10/12/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting with SZG, and VXY re pending trial prep projects, trial supplies and documents to bring to the court tomorrow.
10/12/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare attorney binder of daily trial transcript for 10.12.23
10/12/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated draft of trial box index logging trial supplies and documents sent to court
10/12/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Calls and correspondence with HJ, RRX, VXY, and ALR re trial boxes to send to court for tomorrow 10/13/23
10/12/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Update office version of daily transcript trial binder
10/12/2023	Shira Gelfand	SZG	17.9	\$425.00	\$7,607.50	Attend trial (8.5); post trial work and prep for next day (9.4).
10/12/2023	Vincent Yang	VXY	8.5	\$325.00	\$2,762.50	Attend trial re examination of Shaukat and Vardaman.
10/12/2023	Vincent Yang	VXY	0.9	\$325.00	\$292.50	Compile admitted exhibits list.
10/12/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Combine daily court transcripts.
10/12/2023	Vincent Yang	VXY	1.5	\$325.00	\$487.50	Prepare trial presentation laptop and annotate outlines re exhibit presentation callouts
10/12/2023	Vincent Yang	VXY	0.6	\$162.50	\$97.50	Commute from courthouse to office with trial supplies.
10/13/2023	Abigail L. Robinson	ALR	5.0	\$325.00	\$1,625.00	Attend Rowe trial.
10/13/2023	Cara E. Greene	CEG	11.7	\$950.00	\$11,115.00	Trial Day 4 and debrief.
10/13/2023	Cara E. Greene	CEG	1.0	\$475.00	\$475.00	Travel to and from courthouse.
10/13/2023	Gregory S. Chiarello	GSC	10.4	\$800.00	\$8,320.00	Trial: Day 4 (8.1); conferences with CEG re week two strategy (2.3).
10/13/2023	Hector Jacome	HJ	1.0	\$75.00	\$75.00	Travel from office to 500 Pearl Street, transport boxes early in the morning
10/13/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re meeting with SZG, and VXY re pending trial prep projects, trial supplies and documents to bring to the court tomorrow.
10/13/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
10/13/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Calls and correspondence with HJ, RRX, ALR, CEG, and SZG re coordination of delivery of additional box of trial supplies to court.
10/13/2023	Shira Gelfand	SZG	10.3	\$425.00	\$4,377.50	Attend trial (8.5); call with CEG and correspondence with team re weekend work (1.8)

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
10/13/2023	Vincent Yang	VXY	9.0	\$325.00	\$2,925.00	Attend trial re examinations of witness Vardaman and Grannis.
10/14/2023	Shira Gelfand	SZG	0.2	\$425.00	\$85.00	Correspondence with team.
10/15/2023	Abigail L. Robinson	ALR	8.5	\$325.00	\$2,762.50	Circulate and begin to update Admitted Exhibit index (.8), Call conference with Trial Team re daily assignments (.3), Continue to update Admitted Exhibit index and circulate to Trial Team (.8), Q/C Admitted Exhibits and review VXY's list recirculate to Trial Team (.8), Update Primary Exhibit Index with admitted exhibits and with which Witness (1.3), Create and circulate index of PX exhibits that have yet to be admitted (.3), Create list of deposition video clips that have been used and circulate to Trial Team (.7), Create and circulate a list of exhibits with pending objections (.4), Review transcripts and create list of Limiting Instructions - circulate to Trial Team (2), Create deposition designation scripts of just designations with objections (1.1),.
10/15/2023	Cara E. Greene	CEG	6.3	\$950.00	\$5,985.00	Prepare for trial week 2.
10/15/2023	Gregory S. Chiarello	GSC	7.2	\$800.00	\$5,760.00	Team meeting re week 2 (1.5); draft Beaupain examination outline (3.2); review and discuss remaining evidence with CEG (.9); team conferences re letter to court (1.3); SZG conferences re week 2 (.3).
10/15/2023	Napoleon Zapata	NAZ	1.5	\$325.00	\$487.50	Prepare updated index of deposition designations within the Eryurek, Wilson, and Breslow depositions to cut and keep.
10/15/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with ALR, CEG, and SZG re preparation of updated index of deposition designations within the Eryurek, Wilson, and Breslow depositions to cut and keep.
10/15/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated task list of pending trial prep projects.
10/15/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Prepare updated Kliphouse witness binder for attorney review.
10/15/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with SZG re preparation of updated Kliphouse witness binder for attorney review
10/15/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting with CEG re preparation of updated index of deposition designations within the Eryurek, Wilson, and Breslow depositions to cut and keep.
10/15/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with VXY SZG, and ALR re redactions for Pltf Ex. 57, and 108
10/15/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Review and redact Pltf Ex. 57, and 108.
10/15/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Update physical copies of plaintiff trial exhibit binders with redacted pltf ex. 57 and 108
10/15/2023	Napoleon Zapata	NAZ	1.3	\$325.00	\$422.50	Update daily trial transcript binder and note locations of beginning of witness examinations
10/15/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Update internal litops copy of daily trial transcript binder, and electronic copy
10/15/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meeting with ALR, CEG, and GSC re status updates, pending trial prep projects and upcoming deadlines
10/15/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and compile notes re meeting with ALR, CEG, and GSC re status updates, pending trial prep projects and upcoming deadlines.
10/15/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
10/15/2023	Shira Gelfand	SZG	8.3	\$425.00	\$3,527.50	Rowe trial prep; meeting with team; drafting outlines and letter to court; review of exhibits and designations
10/15/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Update admitted exhibit list.
10/16/2023	Abigail L. Robinson	ALR	0.9	\$325.00	\$292.50	Arrive in office, check for boxes that needed to go to Jay, in office colleague conference, follow up on overdue invoice, inbox Q/C.
10/16/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Update Witness Calendar.
10/16/2023	Abigail L. Robinson	ALR	2.7	\$325.00	\$877.50	Create admitted exhibit binders with selected slip sheets for CEG.
10/16/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Update script of just objected designated testimony.
10/16/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Review updates on PX57 and PX108.
10/16/2023	Abigail L. Robinson	ALR	0.3	\$325.00	\$97.50	Update PX57 and PX108 in binders.
10/16/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Process Order at ECF Document Number 335.
10/16/2023	Abigail L. Robinson	ALR	0.7	\$325.00	\$227.50	Add transcript lines to the index of video clips played at trial
10/16/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Print and bring requested materials to GSC.
10/16/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Conference with SZG re schedule/.
10/16/2023	Cara E. Greene	CEG	10.2	\$950.00	\$9,690.00	Prepare for second week of trial (direct and cross outlines, review evidentiary record and trial transcripts, review evidentiary issues for court briefing, closing arguments, etc.).
10/16/2023	Gregory S. Chiarello	GSC	11.6	\$800.00	\$9,280.00	Beaupain examination outline (1.8); revise Harteau examination outline (1.3); team meetings (2.1); meet & confer call with Google re remaining document objections (.8); preparation for same (.7); conferences with CEG (1.2); Lawrence cross examination outline (1.5); draft, edit letters to court (1.5); draft Tessier examination outline (.7).
10/16/2023	Makaria S. Yami	MSY	0.6	\$325.00	\$195.00	Organize and save filed documents re trial, witnesses, and evidence.
10/16/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Save order re trial time and testimony.
10/16/2023	Napoleon Zapata	NAZ	1.2	\$325.00	\$390.00	Update plaintiff deposition designations, and plaintiff counter designations in TextMap
10/16/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with SZG, ALR, CEG, GSC, VXY, and RRX re updates to plaintiff deposition designations and plaintiff counter designations in TextMap.
10/16/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated draft of task list containing pending trial prep projects
10/16/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
10/16/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with VXY, SZG, and ALR re preparation of additional copy of daily trial binder
10/16/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with SZG, and VXY re updates to deposition designations and objections
10/16/2023	Napoleon Zapata	NAZ	3.4	\$325.00	\$1,105.00	Update deposition manuscripts with updated designations, objections, and exhibit equivalents for attorney review
10/16/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with SZG, ALR, and CEG re updates to Pltf Ex. 57, and Pltf Ex. 108
10/16/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Update Pltf Ex. 57, and Pltf Ex. 108 for attorney review.
10/16/2023	Napoleon Zapata	NAZ	1.3	\$325.00	\$422.50	Review updated deposition designations, and counter designations to identify updates to objections in advance of updating full and mini deposition manuscripts.
10/16/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Review correspondence re updates to defendant deposition designations in advance of updating in TextMap
10/16/2023	Shira Gelfand	SZG	11.3	\$425.00	\$4,802.50	Team meeting; prepare cross exam outlines; prepare letters to court; prep for meet and confer; attend meet and confer; meeting with team; review court order; trial prep.
10/16/2023	Vincent Yang	VXY	0.9	\$325.00	\$292.50	Review pending task lists and correspondences re same and organize trial file.
10/16/2023	Vincent Yang	VXY	1.7	\$325.00	\$552.50	Update witnesses Eryurek and Wilson scripts re non-live witnesses.
10/16/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Conference with RRX re scheduling.
10/16/2023	Vincent Yang	VXY	1.6	\$325.00	\$520.00	Assemble GSC copy of daily trial manuscripts binder.
10/16/2023	Vincent Yang	VXY	1.7	\$325.00	\$552.50	Review Burdis deposition video for Trial.
10/16/2023	Vincent Yang	VXY	1.3	\$325.00	\$422.50	Update designations in transcripts to reflect updates.
10/17/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Review Rowe assignment requests and search in TextMap for requested information.
10/17/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Additional search in TextMap for requested information.
10/17/2023	Abigail L. Robinson	ALR	0.8	\$325.00	\$260.00	Quality control review of deposition transcripts played at trial.
10/17/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Review email from SZG re schedule and correspondence with RRX re schedule for the week
10/17/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Finalize and file letter re evidence, jury charge, verdict, stipulations, and limiting instructions
10/17/2023	Abigail L. Robinson	ALR	1.4	\$325.00	\$455.00	Update designations and objections in scripts for Eryurek and Wilson.
10/17/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Correspondence with VXY and NAZ re designations and objections - remove designations from Burdis and Eryurek scripts.
10/17/2023	Abigail L. Robinson	ALR	2.6	\$325.00	\$845.00	Review trial transcript for requested testimony email work product to Trial Team
10/17/2023	Abigail L. Robinson	ALR	0.4	\$325.00	\$130.00	Conference with RRX, VXY, and NAZ re ongoing assignments and schedule for the week
10/17/2023	Abigail L. Robinson	ALR	0.6	\$325.00	\$195.00	Update Grannis Redirect outline with transcript lines.
10/17/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Review and save Letter at ECF Document number 337.
10/17/2023	Abigail L. Robinson	ALR	0.8	\$325.00	\$260.00	Update Grannis outline with transcript lines.
10/17/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Correspondence with team re night work.

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
10/17/2023	Cara E. Greene	CEG	14.6	\$950.00	\$13,870.00	Prepare for second week of trial (direct and cross outlines, closing arguments, meet and confer and evidentiary briefing letter, prep deposition readers, etc.).
10/17/2023	Gregory S. Chiarello	GSC	12.3	\$800.00	\$9,840.00	Conference with CEG re week two of trial (1.5); finalize Harteau, Beaupain, Tessier outlines with CEG (1.9); review and edit Grannis, Ostrofe examination outlines (2.7); various work related to closing argument (6.2).
10/17/2023	Lindsay M. Goldbrum	LMG	3.3	\$450.00	\$1,485.00	Review trial transcript and prepare points for closing.
10/17/2023	Makaria S. Yami	MSY	0.2	\$325.00	\$65.00	Review and organize case files re new docket entries.
10/17/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Update witness binders and plaintiff trial exhibit binders.
10/17/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare Defendant PROD035 for export in advance of updating deposition binder for attorney review
10/17/2023	Napoleon Zapata	NAZ	2.9	\$325.00	\$942.50	Prepare courtesy copies of full deposition transcripts with objections and exhibit equivalents, and physical copies of witness examination outlines and filed letters for use during trial proceedings.
10/17/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meeting with RRX, VXY, and ALR re status updates, pending trial prep projects, and litops trial scheduling
10/17/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare daily trial transcript for attorney review.
10/17/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Meetings and correspondence with CEG and ALM re pending trial prep projects and workflow for preparing screenshots of trial exhibits to use for closing powerpoint.
10/17/2023	Napoleon Zapata	NAZ	1.4	\$325.00	\$455.00	Prepare screenshots of trial exhibits to use for closing powerpoint for attorney review
10/17/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Correspondence and calls with HJ, RRX, CEG, SZG, and GSC re trial boxes to bring to court tomorrow 10/18/23
10/17/2023	Napoleon Zapata	NAZ	1.2	\$325.00	\$390.00	Prepare and pack trial boxes to bring to court tomorrow 10/18/23
10/17/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Update plaintiff trial exhibit binders, and witness binders with updated exhibits and deposition minuscpts
10/17/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Review Florissi witness binder to identify missing documents and replace them.
10/17/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with SZG re preparation and assembly of Florissi trial binder
10/17/2023	Napoleon Zapata	NAZ	1.6	\$325.00	\$520.00	Prepare, finalize and QC Florissi Trial binder for attorney review
10/17/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with CEG, GSC, and SZG re documents to print and deliver to attorneys for review and analysis
10/17/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
10/17/2023	Shira Gelfand	SZG	13.8	\$425.00	\$5,865.00	Prepare for remote witness (2); prepare for closing and cross examination outlines, letter to court (8.8); team meetings re same (3).
10/17/2023	Tara K. Quaglione	TKQ	9.9	\$450.00	\$4,455.00	Review Patricia Florissi deposition and draft memo re same; correspondence with SZG, CEG, GSC re same
10/17/2023	Vincent Yang	VXY	2.0	\$325.00	\$650.00	Coordinate remote video technology with Court's IT team at Courthouse.
10/17/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Correspondence and conference with Veritext court reporter re video files
10/17/2023	Vincent Yang	VXY	1.2	\$325.00	\$390.00	Reorganize witness Florissi witness binder.
10/17/2023	Vincent Yang	VXY	2.4	\$325.00	\$780.00	Review daily transcripts re topics designated by CEG and pulls excerpts for review.
10/17/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Conference with RRX, ALR, and NAZ re trial agenda.
10/17/2023	Vincent Yang	VXY	0.8	\$325.00	\$260.00	Conference with GSC, CEG, and SZG re trial callouts, witness scripts, and designation updates
10/17/2023	Vincent Yang	VXY	2.2	\$325.00	\$715.00	Finalize witness scripts and upload expert witness video to presentation software.
10/17/2023	Vincent Yang	VXY	1.4	\$325.00	\$455.00	Annotate presentation outlines and prepare video clips.
10/17/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Correspondence with opposing counsel re update on remote witness appearance.
10/17/2023	Vincent Yang	VXY	0.4	\$162.50	\$65.00	Commute to office from courthouse after technology runthrough.
10/18/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Coordinate lunch order and delivery.
10/18/2023	Abigail L. Robinson	ALR	5.0	\$325.00	\$1,625.00	Attend trial.
10/18/2023	Abigail L. Robinson	ALR	1.6	\$162.50	\$260.00	Travel time to attend trial.
10/18/2023	Abigail L. Robinson	ALR	0.2	\$325.00	\$65.00	Conference with RRX re trial.
10/18/2023	Abigail L. Robinson	ALR	4.6	\$325.00	\$1,495.00	Conference with VXY re updated exhibit list, update Primary Exhibit Index, correspondence with Attys re assignments for the evening, correspondence with opposing counsel's paralegal re status of trial transcript, update deposition transcript video log, process daily trial transcripts, legal research for joint letter, finalize and file joint letter, create binder for joint letter and cases, legal research for jury charge.
10/18/2023	Cara E. Greene	CEG	14.1	\$950.00	\$13,395.00	Trial day 5 and prepare for trial day 6.
10/18/2023	Cara E. Greene	CEG	1.0	\$475.00	\$475.00	Travel to and from courthouse.
10/18/2023	Gregory S. Chiarello	GSC	13.7	\$800.00	\$10,960.00	Trial Day 5 (8.2); review daily transcript for closing argument inserts (4.7); prepare for Day 6 (.8)
10/18/2023	Hector Jacome	HJ	2.0	\$75.00	\$150.00	Travel from office to courthouse, arrive very early to deliver boxes for trial at 500 Pearl Street
10/18/2023	Jennifer Davidson	JDX	0.8	\$425.00	\$340.00	Research re: duty to supplement based on trial evidence.
10/18/2023	Lindsay M. Goldbrum	LMG	6.1	\$450.00	\$2,745.00	Review and pull trial and deposition excerpts for closing (3.9); telephone conference with GSC re research (.1); correspondence with SZG and GSC re research (.1); correspondence with JDX re research (.1); research re continuing discovery obligation (1.9).
10/18/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated task list of upcoming trial prep projects and deadlines.
10/18/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
10/18/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Calls and correspondence with HJ, SZG, and ALR re documents and witness binders to deliver to court for trial proceedings.
10/18/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare witness binders and documents for bringing to court for use during trial proceedings
10/18/2023	Napoleon Zapata	NAZ	1.5	\$325.00	\$487.50	Deliver trial box containing witness binders and documents for attorney use during trial proceedings
10/18/2023	Napoleon Zapata	NAZ	0.1	\$325.00	\$32.50	Correspondence with CEG, SZG, GSC, and AMW re trial supplies, documents, and lunch to bring to court for tomorrow 10/18/23.
10/18/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare TextMap reports containing plaintiff deposition designations and plaintiff counter designations to calculate the number of lines in each designation type.
10/18/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meetings with HJ and ALR re trial supplies and documents to bring to court for trial proceedings tomorrow 10/18/23.
10/18/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence and call with SZG and HJ re boxes to bring back to the office from court tomorrow
10/18/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated task list of upcoming trial prep projects and deadlines.
10/18/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
10/18/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Prepare and finalize trial boxes for sending to Court tomorrow 10/19/23
10/18/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Correspondence with SZG, HJ, RRX, VXY, and ALR re logistics and deliver of trial boxes for sending to Court tomorrow 10/19/23.
10/18/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Scan CEG trial notepad for attorney review and analysis in advance of trial proceedings
10/18/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Update Florissi trial binder for attorney review.
10/18/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Pull deposition transcript and trial transcript citations and prepare letter exhibits in advance of filing letter
10/18/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Update court and litops copy of daily trial binder
10/18/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence and calls with HJ, RRX, VXY, SZG, and ALR re logistics for sending trial boxes from the court to the office.
10/18/2023	Naomi Campusano	NCX	0.4	\$350.00	\$140.00	Create TextMap report and correspond with NXZ re same.
10/18/2023	Shira Gelfand	SZG	17.8	\$425.00	\$7,565.00	Prep for; attend court; file letter and prep for closing and cross exam
10/18/2023	Vincent Yang	VXY	9.0	\$325.00	\$2,925.00	Attend trial re examination of witnesses Grannis, Beaupain, Tessier, Ostrofe, Humez.
10/18/2023	Vincent Yang	VXY	0.7	\$325.00	\$227.50	Update admitted exhibits list.
10/18/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Restore presentation laptop backup.
10/18/2023	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Prepare trial materials and binders for next day.
10/18/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Conference with RRX re backing up and restoring trial laptop.
10/18/2023	Vincent Yang	VXY	0.6	\$162.50	\$97.50	Commute from courthouse to office with trial supplies.
10/18/2023	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Prepare and annotate witness outlines and trial presentation laptops with documents for examination
10/19/2023	Abigail L. Robinson	ALR	1.1	\$325.00	\$357.50	Quality control legal research for Jury Charge. Print and assemble updated JTPC binder

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Outten Golden LLP
Lodestar

Date	Timekeeper	Initials	Hours	Rates	Amount	Description
10/19/2023	Abigail L. Robinson	ALR	8.0	\$325.00	\$2,600.00	Work to prepare for closings. Review discovery and create charts and materials requested by attorneys. Solidify exhibit and witness list and coordinate hard copies for jury.
10/19/2023	Cara E. Greene	CEG	18.8	\$950.00	\$17,860.00	Trial Day 6 and prepare for trial day 7.
10/19/2023	Cara E. Greene	CEG	1.0	\$475.00	\$475.00	Travel to and from courthouse.
10/19/2023	Gregory S. Chiarello	GSC	19.4	\$800.00	\$15,520.00	Trial day 3 (8.3); work related to closing (transcript cites, edit powerpoint) (11.1)
10/19/2023	Hector Jacome	HJ	2.0	\$75.00	\$150.00	Travel from office to courthouse, deliver attorney boxes early in the morning, pick up 17 boxes to bring back to the office.
10/19/2023	Lindsay M. Goldbrum	LMG	3.4	\$450.00	\$1,530.00	Review and pull excerpts from trial transcripts and depositions for closing arguments
10/19/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with SZG re structure of Florissi binder.
10/19/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Meeting with AMW re trial supplies and logistics.
10/19/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Meetings and correspondence with RRX, HJ, SZG, and ALR re documents and witness binders to deliver to court for trial proceedings.
10/19/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meetings with CEG, GSC, and ALR re pending trial prep projects, status updates, and delivery of boxes containing admitted plaintiff trial exhibit binders for jury use.
10/19/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated draft of trial box index.
10/19/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare and finalize trial boxes for delivery to the court tomorrow 10/20/23
10/19/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Prepare updated draft of litops daily trial transcript binder
10/19/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Update GSC trial binder with daily trial transcripts.
10/19/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Update court copy of daily trial binder with updated daily trial transcripts, and updated tabs showing the start of witness examinations.
10/19/2023	Napoleon Zapata	NAZ	1.4	\$325.00	\$455.00	Prepare document containing exhibit screenshots for use in closing powerpoint
10/19/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Compare exhibit lists from both parties to identify differences in listed admitted exhibits
10/19/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Prepare binder covers, spines, and index for admitted plaintiff trial exhibit binder
10/19/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Correspondence with Transperfect Legal Solutions, GSC, SZG, CEG, RRX, VXY, ALR, and TAM re preparation of admitted plaintiff trial exhibit binders.
10/19/2023	Napoleon Zapata	NAZ	0.7	\$325.00	\$227.50	Prepare and stage admitted plaintiff trial exhibits for sending to Transperfect Legal Solutions to print and assemble into binders.
10/19/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Pull and send combined trial exhibit list with exhibits organized by deposition witness for attorney review
10/19/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Meetings and calls with ALR, TAM, and HJ re structure of admitted trial exhibits binder, and coordination of delivery of trial boxes, and admitted plaintiff trial exhibit binders.
10/19/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Prepare updated task list of pending trial prep projects.
10/19/2023	Shira Gelfand	SZG	20.6	\$425.00	\$8,755.00	Attend court trial (11); prepare for closing (9.6)
10/19/2023	Vincent Yang	VXY	6.5	\$325.00	\$2,112.50	Attend trial re examinations of Kliphouse, Humez, Florissi, Callaghan, Stevens, Lawrence
10/19/2023	Vincent Yang	VXY	1.0	\$325.00	\$325.00	Update admitted exhibits list.
10/19/2023	Vincent Yang	VXY	5.3	\$325.00	\$1,722.50	Format exhibit list and provide descriptions for exhibits; reconcile admitted exhibits list with Defendants
10/20/2023	Abigail L. Robinson	ALR	9.4	\$325.00	\$3,055.00	Attend closing and await jury verdict.
10/20/2023	Cara E. Greene	CEG	13.1	\$950.00	\$12,445.00	Trial Day 7 (11.0); post-trial meeting (2.1).
10/20/2023	Cara E. Greene	CEG	1.0	\$475.00	\$475.00	Travel to and from courthouse.
10/20/2023	Gregory S. Chiarello	GSC	11.7	\$800.00	\$9,360.00	Trial Day 7.
10/20/2023	Hector Jacome	HJ	2.0	\$75.00	\$150.00	Travel from office to court, arrive in early hours and made 2 trips to 500 Pearl; bring lawyers binders and binders from TLS.
10/20/2023	Hector Jacome	HJ	2.0	\$75.00	\$150.00	Travel from Court back to the office; waited for jurors to deliberate and bring boxes back to office
10/20/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Add minute entry re jury trial to case files.
10/20/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Correspondence with TAM, and ALR re updates to document tracking deposition text of videos played during trial proceedings for attorney review.
10/20/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
10/20/2023	Napoleon Zapata	NAZ	0.5	\$325.00	\$162.50	Correspondence and meetings with HJ,RRX, VXY, and ALR re delivery of boxes containing admitted plaintiff trial exhibit binders for jury review.
10/20/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Prepare updated draft of task list containing pending trial prep projects
10/20/2023	Shira Gelfand	SZG	14.2	\$425.00	\$6,035.00	Attend trial; post trial discussion and meeting with team.
10/20/2023	Vincent Yang	VXY	12.0	\$325.00	\$3,900.00	Attend trial re jury deliberations and closings; pack and clean up courtroom supplies and documents
10/20/2023	Vincent Yang	VXY	0.6	\$162.50	\$97.50	Commute to office from courthouse with boxes of supplies and documents.
10/22/2023	Gregory S. Chiarello	GSC	0.8	\$800.00	\$640.00	Telephone call with CEG re post-trial strategy on motions (.4); telephone call with client, CEG re same (.4)
10/23/2023	Gregory S. Chiarello	GSC	0.0	\$0.00	\$0.00	Berlin Rosin call with client, CEG (.4)(no charge).
10/23/2023	Gregory S. Chiarello	GSC	0.1	\$800.00	\$80.00	Review Day 7 transcript re verdict.
10/23/2023	Napoleon Zapata	NAZ	0.3	\$325.00	\$97.50	Review and organize emails re trial prep projects, status updates, and meeting scheduling.
10/23/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Update court copy and litops copy of daily trial transcript binders, and add tabs for closing statements
10/23/2023	Napoleon Zapata	NAZ	0.6	\$325.00	\$195.00	Review trial boxes and deposition transcripts to compile all sealed and certified deposition transcripts in advance of sending to Records for logging into Records system.
10/23/2023	Napoleon Zapata	NAZ	0.4	\$325.00	\$130.00	Correspondence and meeting with RRX, HJ, DL, and DXS re logging into records system and creating labels for sealed and certified deposition transcripts.
10/23/2023	Napoleon Zapata	NAZ	0.2	\$325.00	\$65.00	Correspondence with GSC re moving of trial boxes and supplies from Ginsberg to Jay conference room
10/23/2023	Vincent Yang	VXY	0.4	\$325.00	\$130.00	Submit check request to accounting re witness subpoena fees.
10/23/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Submit expense reimbursement re trial invoices.
10/24/2023	Gregory S. Chiarello	GSC	0.5	\$800.00	\$400.00	Correspondence with CEG, SZG re port-trial motions (.2); revise joint letter re motion schedule and correspondence with S. Tomezco re same (.3).
10/24/2023	Gregory S. Chiarello	GSC	0.0	\$0.00	\$0.00	NBC call with client (.6)(no charge).
10/24/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Save filing re minute entry.
10/25/2023	Makaria S. Yami	MSY	0.2	\$325.00	\$65.00	Save verdict form and joint letter to case files.
10/26/2023	Abigail L. Robinson	ALR	1.4	\$325.00	\$455.00	Sort through and condense trial boxes.
10/26/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Process dockets 340 & 341.
10/26/2023	Abigail L. Robinson	ALR	0.1	\$325.00	\$32.50	Follow up on invoices.
10/26/2023	Abigail L. Robinson	ALR	0.5	\$325.00	\$162.50	Continue to consolidate trial boxes and move them to Conference room Jay.
10/26/2023	Makaria S. Yami	MSY	0.1	\$325.00	\$32.50	Save order to case files.
10/26/2023	Vincent Yang	VXY	0.2	\$325.00	\$65.00	Correspondence with GSC and CEG re trial transcript costs.
10/27/2023	Jennifer LaMarch	JLM	0.2	\$350.00	\$70.00	Docket/calendar control.
10/27/2023	Vincent Yang	VXY	0.1	\$325.00	\$32.50	Correspondence to accounting to approve check requests.
10/27/2023	Vincent Yang	VXY	0.3	\$325.00	\$97.50	Update check requests for accounting to process.

Total: 8,972.9 \$4,458,313.75